3.1 INTRODUCTION

No new significant environmental impacts or issues, beyond those already covered in the Draft EIR and Revised Draft EIR for the Martis Valley Community Plan Update, were raised during the comment period, and Placer County, acting as lead agency, directed that responses to the Draft EIR and Revised Draft EIR comments be prepared. Responses to comments received during the comment period do not involve any new significant impacts or "significant new information" that would require recirculation of the Draft EIR and Revised Draft EIR pursuant to CEQA Guidelines Section 15088.5.

3.2 LIST OF COMMENTORS

The following individuals and representatives of organizations and agencies submitted written comments on the Draft EIR and Revised Draft EIR:

Letter	Individual or Signatory	Affiliation	Date
A	Michael S. Terwilliger	Truckee Fire Protection District of Nevada County	6/18/02
B	Jeffrey Pulverman	Caltrans	7/23/02
C	Lori Lawrence	Northstar Community Services District	8/9/02
D	Paul Rouser	Northstar Community Services District	8/9/02
E	Jeffrey Pulverman	Caltrans	8/19/02
F	Mark Tomich, AICP	County of Nevada Community Development Agency	8/19/02
G	Mal Toy	Placer County Water Agency	8/16/02
H	O.R. Butterfield, P.E.	Truckee Sanitary District	8/16/02
I	Scott Ferguson, P.E.	California Regional Water Quality Control Board, Lahontan Region	8/19/02
J	Juan Palma	Tahoe Regional Planning Agency	8/19/02
K	Mark L. Thomas	County of Nevada Fish & Wildlife Commission	8/14/02
L	Craig F. Woods	Tahoe-Truckee Sanitation Agency	8/19/02
M	Ron Florian	Town of Truckee	8/19/02
N	Gretchen Bennitt	Northern Sierra Air Quality Management District	8/16/02
O	Alison Warnes	North Tahoe Regional Advisory Council	8/8/02
P	Sandy Hesnard	Department of Transportation, Division of Aeronautics	4/28/03
Q	Jeffrey Pulverman	Department of Transportation, District 3	4/29/02
R	Scott Ferguson, P.E.	California Regional Water Quality Control Board, Lahontan Region	4/28/03
S	Gretchen Bennitt, APCO	Northern Sierra Air Quality Management District	4/30/03
T	Tim Beals	Sierra County Department of Planning and Building Inspection	5/5/03
1	Paul Vatistas	North Tahoe Conservation Coalition	6/20/02
2	Bob Johnson	UC Davis	6/24/02
3	Dan and Alysa Pearson		7/8/02
4	Diane Young McCormack		7/16/02

Letter	Individual or Signatory	Affiliation	Date
5	Sabina Strauss		7/22/02
6	Liana M. Dicus		7/23/02
7	Stephen Harris		7/28/02
8	Lanny H. Fisk, PhD RG	PaleoResource Consultants	7/29/02
9	Ellen Hyatt		7/25/02
10	Richard Anderson	Fly Fisher	7/31/02
11	Brigitte Kaneda		8/2/02
12	Gaylan Larson		8/4/02
13	Robert Ferroggiaro	Federation of Fly Fishers	8/5/02
14	Lynne Larson		8/6/02
15	Ed Morgan		8/9/02
16	Pamela Lane		8/7/02
17	Ann Panfield		7/15/02
18	Jennifer Merchant		8/12/02
19	Jennifer Merchant	Truckee North Tahoe	8/16/02
20	Bob Wilson		7/15/02
21	Paul Vatistas	North Tahoe Conservation Coalition	7/15/02
22	Kelly George		7/15/02
23	David Landis		7/28/02
24	Charles Patterson		7/31/02
25	Aaron Revere		8/5/02
26	Nancy Nobriga		8/5/02
27	George Sublett, Jacob Roth, Stephen Harris		8/4/02
28	Holly Verbeck		8/9/02
29	Lynne Larson		8/2/02
30	Charles Haynes		8/9/02
31	Lynn Burch		8/11/02
32	Richard George		8/11/02
33	Robin Christen Haynes		8/11/02
34	Patricia Stanley	sierrawatch group	8/11/02
35	Unknown		8/12/02
36	David Landis		8/12/02
37	David Landis		8/13/02
38	David Landis		8/13/02
39	Tracy Cuneo		8/14/02
40	Larry@babow.org		8/14/02
41	Sue Kares		8/14/02
42	Jack Moore		8/14/02
43	Donnell Carr		8/12/02
44	Richard Anderson		8/14/02
45	Yvonne Merrick		8/15/02
46	Lisa Dearing		8/15/02
47	Tyler Palmer		8/15/02
48	Paul Vatistas	North Tahoe Conservation Coalition	8/15/02
49	Alan Spinola		8/12/02

Letter	Individual or Signatory	Affiliation	Date
50	David Kean	Tahoe Group of the Sierra Club	8/17/02
51	Peggy Towns		8/18/02
52	Janie Collomb		8/14/02
53	M. Gary Collomb		8/14/02
54	Gail High		8/18/02
55	Tanya and Jim Miller		8/19/02
56	Jay Mayhall	Sierra Watch	8/19/02
57	Beth Ingalls		8/17/02
58	Paul Vatistas	North Tahoe Conservation Coalition	8/19/02
59	Nat and Marilyn Goldhaber		8/19/02
60	Alvina Patterson		8/19/02
61	Cathy Nason, A.S.I.D.	Interior Design	8/17/02
62	Andy Rost		8/19/02
63	Andy Rost		8/19/02
64	Jack Nixon		8/19/02
65	Duff Kurland		8/19/02
66	Richard Ekman		8/15/02
67	Hank Simmons	Northstar Property Owners Association	8/13/02
68	Adda Quinn		8/17/02
69	Adda Quinn		8/17/02
70	Jeffrey Davis		8/18/02
71	Richard George		8/18/02
72	Jerome Yesavage	California Trout	8/19/02
73	Jerome Yesavage	California Trout	8/19/02
74	David Landis		8/13/02
75	David Landis		8/13/02
76	David Landis		No Date
77	William and Christine Evans		8/19/02
78	Dennis Dickinson		8/19/02
79	Carter Schleicher, C.W.B.	CSCON	8/16/02
80	Lanny Winberry		8/16/02
81	Thomas Bleier		8/19/02
82	Mary Bennett		8/19/02
83	Mary Hetherington		8/19/02
84	Peggy Towns		8/17/02
85	Dr. Rowan Rowntree		8/19/02
86	Stacy Russell		8/19/02
87	Pamela Schwarz		8/18/02
88	Glenn Miller		8/18/02
89	Margaret Oliver		8/18/02
90	Darren Lipsmeyer		8/18/02
91	Deborah & Richard Fuqua		8/18/02
92	Robert Bell		7/16/02
93	Paul Vatistas	North Tahoe Conservation Coalition	8/15/02
94	Unknown		8/16/02

Letter	Individual or Signatory	Affiliation	Date
95	Bonnie Stetson		8/14/02
96	Christine Griffith	Stoel Rives, LLP	8/19/02
97	Anne Dain	Martis Valley Associates	8/19/02
98	Lisa Davis		8/9/02
99	Phyllis Bradbury		8/15/02
100	Ronda Talmadge		8/13/02
101	Ronda Talmadge		8/13/02
102	John Firpo		8/19/02
103	Gerald Walsh		8/10/02
104	Michael Talmadge		8/13/02
105	Michael Talmadge		8/13/02
106	Edward Newland		8/6/02
107	Donald Colclough		8/16/02
108	Marie Moore		8/17/02
109	Michelle Chambers		8/01/02
110	Natalie Korp		8/17/02
111	Robert Houser		8/16/02
112	Catherine Parsons		8/15/02
113	Mick Melvin		8/17/02
114	Linda Melvin		8/17/02
115	Anne Solvason		8/14/02
116	Jeff Solvason		8/14/02
117	Tracy Cuneo		8/14/02
118	Tracy Cuneo		8/14/02
119	Unknown		8/19/02
120	Unknown		8/15/02
121	Timothy Farrell		8/12/02
122	Peggy Towns		8/18/02
123	William Hanson		8/17/02
124	Peggy Towns		8/17/02
125	Nikki Riley		8/16/02
126	Brendan Riley		8/16/02
127	Brendan Riley		8/16/02
128	Brendan Riley		8/16/02
129	Unknown		7/15/02
130	Christine Otto		7/15/02
131	Daniel Tuerk, MD		7/15/02
132	Joel Erickson		8/19/02
133	Nessa Wettemann		8/16/02
134	Stacie Creps		8/19/02
135	Stefanie Olivieri		8/18/02
136	David Welch		8/18/02
137	Unknown	League to Save the Lake	8/15/02
138	Shirley Allen		8/16/02
139	Steve Klutter		No date

Letter	Individual or Signatory	Affiliation	Date
140	Ann Bryant	Bear League	8/14/02
141	Robert Braddock		8/14/02
142	J. Wayne Kurlak		8/13/02
143	Robert Pardee		8/16/02
144	Julie Ginocchio		8/13/02
145	Julie Ginocchio		8/14/02
146	Julie Ginocchio		8/14/02
147	Jonnie and Rod Jacobs		8/14/02
148	Steve Holl	Steve Holl, Wildlife Biology, Natural Resource Planning	8/16/02
149	Tracy Cuneo		8/15/02
150	Helga Roghers		8/15/02
151	Donna and Jerry Silverberg		8/16/02
152	Chris Hanke		8/16/02
153	Janice Conover		8/17/02
154	Paul Eggers		8/17/02
155	Jeff Hatch		8/18/02
156	Deanna Weber	Design Workshop	8/19/02
157	Kathy Welch		8/13/02
158	Richard S. Taylor and Janette Schue	Shute, Mihaly & Weinberger LLP	8/16/02
159	Kathy Welch		8/13/02
160	Kathy Welch		8/13/02
161	Kathy Welch		8/16/02
162	David Welch		8/14/02
163	David Welch		8/15/02
164	David Welch		8/15/02
165	David Welch		8/15/02
166	David Welch		8/15/02
167	David Welch		8/15/02
168	David Welch		8/15/02
169	David Welch		8/16/02
170	David Welch		8/16/02
171	David Welch		8/16/02
172	David Welch		8/10/02
173	Kathy Welch		8/17/02
174	David Welch	Sierra Watch	8/16/02
175	Robert Hamilton		8/12/02
176	William Goodwin		8/12/02
177	Philip Coyle		8/15/02
178	Timothy Polishook	Ship/Art International	8/16/02
179	Bradley Harlan		8/19/02
180	Tracy Cuneo		8/19/02
181	Margaret J. and John E. Sparks		8/19/02
182	Margaret J. & John E. Sparks		8/19/02

Letter	Individual or Signatory	Affiliation	Date
183	Rick Silvani		8/12/02
184	Marvin and Mary Carash		8/19/02
185	Arlee Bird		7/12/02
186	Dennis Moynahan		8/14/02
187	Sean Dowdall		8/16/02
188	Brooke Durastante		7/12/02
189	Larry Pollock		7/12/02
190	Jacqui Zink		8/19/02
191	Kacey Brown		8/19/02
192	Peter Kristian		8/19/02
193	Gary Scott		7/12/02
194	Lori Ashton		7/12/02
195	Diana Comouche		7/12/02
196	Marya Roddis		7/12/02
197	Jacqui Grandfield		8/15/02
198	Martin Meyers and Barbara Sutherland		8/19/02
199	Christine Thoma		8/17/02
200	John Quintana		8/15/02
201	Connie Philipp		8/17/02
202	Unknown		8/15/02
203	Adam Cioth		8/14/02
204	Donald Cooper, D.D.S.		8/13/02
205	Donald Cooper, D.D.S.		8/14/02
206	Thomas Ameika		8/19/02
207	Carmel Kelly		8/19/02
208	James Porter, Jr.		8/19/02
209	Albert Roth, Jr. and Deborah Roth		8/19/02
210	Gerald Meral Steve Rothert Betsy Reifsneider David Myerson David Kean Tim Frank Todd Hutchins Joan Clayburgh	Planning and Conservation League American Rivers Friends of the River Environment Now Sierra Club, Tahoe Club Sierra Club, Challenge to Sprawl Campaign RiverLaw Sierra Nevada Alliance	8/19/02
211	Gavin Moynahan		7/23/02
212	Gavin Moynahan		7/27/02
213	Gavin Moynahan		8/10/02
214	Gavin Moynahan		7/13/02
215	Gavin Moynahan		8/11/02
216	Shannon Raborn	Chair, Tahoe Area Sierra Club Group	8/19/02
217	Michael White, Ph.D.	Conservation Biology Institute	8/15/02
218	Katherine Moynahan		8/19/02
219	Eve Werner		8/14/02
220	John Puccini		8/14/02

Letter	Individual or Signatory	Affiliation	Date
221	George Robertson		8/15/02
222	Marcus LoDuca		8/19/02
223	Pamalla Davis		7/12/02
224	Diana Yale		8/20/02
225	Unknown		8/20/02
226	Leif Brun		8/19/02
227	Tom Sparks		8/19/02
228	Dan Yoder		8/17/02
229	William Abbott	Abbott & Kindermann, LLP	8/20/02
230	Lara Pearson	Law Office of Lara Pearson, Ltd.	8/17/02
231	Tracy Cuneo		8/14/02
232	Alice and Gary Jones		8/12/02
233	Sean Dowdall		8/12/02
234	Whitman Manley	Remy, Thomas, Moose, and Manley, LLP	4/29/03
235	Marcus LoDuca	Sandberg, LoDuca & Dellinger	4/30/03
236	Sean Dowdall		5/2/03
237	Paul Vatistas	North Tahoe Conservation Coalition	4/29/03
238	James Porter, Jr.	Law Office of Porter Simon, Professional Corp.	4/24/03
239	David Welch		4/28/03
240	Adda Quinn		3/15/03
241	Adda Quinn		4/18/03
242	Scott Kennedy		3/22/03
243	Carrie Sherring		3/23/03
244	Pat Dallam		3/22/03
245	Jerome Yesavage	California Trout	3/31/03
246	Scott Shane		4/17/03
247	George Sublett		4/18/03
248	Sabina V. Strauss		4/28/03
249	W. David Brown and Linda Brown		4/30/03
250	David Kean	Tahoe Area Sierra Club	5/2/03
251	Richard Anderson	California Fly Fisher Magazine	4/29/02
252	Jeff Claussen		4/28/03
253	Terrell Watt, AICP	Terrell Watt, AICP, Planning Consultant	4/28/03
254	Gavin Moynahan		4/22/03
255	Timothy Polishook and Jennifer Polishook		4/16/03

3.3 COMMENTS AND RESPONSES

3.3.1 REQUIREMENTS FOR RESPONDING TO COMMENTS ON A DRAFT EIR

CEQA Guidelines 15088 requires that lead agencies evaluate all comments on environmental issues received on the Draft EIR and prepare a written response. The written response must address the significant environmental issue raised and must provide a detailed response, especially when specific comments or suggestions (e.g., additional mitigation measures) are

not accepted. In addition, the written response must be a good faith and reasoned analysis. However, lead agencies need only to respond to significant environmental issues associated with the project and do not need to provide all the information requested by commentors, as long as a good faith effort at full disclosure is made in the EIR (CEQA Guidelines 15204).

CEQA Guidelines 15204 recommends that commentors provide detailed comments that focus on the sufficiency of the Draft EIR in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. CEQA Guidelines 15204 also notes that commentors should provide an explanation and evidence supporting their comments. Pursuant to CEQA Guidelines 15064, an effect shall not be considered significant in the absence of substantial evidence.

CEQA Guidelines 15088 also recommends that where response to comments results in revisions to the Draft EIR, that those revisions to noted as a revision to the Draft EIR or in a separate section of the Final EIR.

3.3.2 MASTER RESPONSES

Several comment letters included common comments on issues associated with the project and the Draft EIR and/or Revised Draft EIR. In order to streamline the Final EIR, master responses have been prepared for these common comments and addressed the following issue areas. However, it should be noted that all comments are responded to in this Final EIR.

- Project Description Adequacy;
- Assumptions Used for Development Conditions in the Plan Area;
- Water Quality;
- Water Supply and Potential Surface Water Effects;
- Adequacy of the Alternatives Analysis;
- Consideration of Impacts to the Tahoe Basin;
- Adequacy of the Cumulative Impact Analysis;
- Affordable and Employee Housing Effects of the Project;
- Adequacy of the Review Period; and
- Adequacy of the Traffic Impact Analysis

3.3.3 RESPONSES TO COMMENT LETTERS

Written comments on the Draft EIR and Revised Draft EIR are reproduced on the following pages, along with responses to those comments. To assist in referencing comments and responses, the following coding system is used:

- Public agency comment letters are coded by letters and each issue raised in the comment letter is assigned a number (e.g., Comment Letter A, comment 1: A-1).

- Individual and interest group comment letters are coded by numbers and each issue raised in the comment letter is assigned a number (e.g., Comment Letter 1, comment 1: 1-1).

Where changes to the Draft EIR text result from responding to comments, those changes are included in the response and demarcated with revision marks (underline for new text, ~~strike-out~~ for deleted text).

3.4 MASTER RESPONSES

3.4.1 PROJECT DESCRIPTION ADEQUACY

Introduction

Several comment letters express concerns that the Draft EIR failed to address the entire extent of the project. These comments specifically noted that the definition of the project was incomplete and it failed to adequately describe the maximum residential and non-residential development potential in regards to dwelling units, square footage, population and recreation uses for the Martis Valley Community Plan area (Plan area). The reader is referred to Master Response 3.4.2 regarding assumptions used in estimating buildout conditions in the Plan area. In addition, the comment letters also suggested that the Draft EIR project description failed to provide adequate information regarding setting conditions, consideration of projects and other planning activities proposed in the Plan area and impacts of the project.

CEQA Guidelines Section 15378(a) defines "project" as the whole of the action that has potential for resulting in either direct physical changes in the environment or a reasonably foreseeable indirect physical change in the environment. CEQA case law notes that the lead agency must fully analyze each "project" in a single environmental document and should not split a project into two or more segments (i.e., segmentation) (*Burbank-Glendale-Pasadena Airport Authority v. Hensler* [2d Dist 1991] 233 Cal. App. 3d 577, 592 [284 Cal.Rptr. 498]). In addition, case law notes that lead agencies should define its projects broadly to ensure a complete analysis of impacts and must include consideration of future expansion or other actions that are identified as a reasonably foreseeable consequence of the project (*Laurel Heights Improvement Association v. Regents of the University of California* [1988] 47 Cal.3d 376, 395396 [253 Cal.Rptr. 426] – commonly referred to as "Laurel Heights I").

As further described below, the extent of the proposed Martis Valley Community Plan Update has been fully described in the Draft EIR.

Definition of the Project Under CEQA and Requirements of an Adequate Project Description

As described above, CEQA Guidelines Section 15378(a) and case law defines "project" as the whole of the action that has potential for resulting in either direct physical changes in the environment or a reasonably foreseeable indirect physical change in the environment. In addition to this definition, CEQA Guidelines 15124 and the Placer County Environmental Review Ordinance define the required content of an EIR project description. The required content of an EIR project description includes the following:

- Identification of the precise location and boundaries of the proposed project, which includes providing a detailed map showing the location;

- A statement of project objectives that consist of the underlying purpose of the project;

- A description of the project's technical, economic and environmental characteristics, considering the principal engineering proposals (if any) and supporting public service facilities; and,

- Identification of the intended uses of the EIR, including a list of approvals and permits required to implement the project.

The Draft EIR includes a detailed description of the project and its components in Section 3.0 (Project Description) of the Draft EIR, which includes text and figures describing the following:

- The project's location and boundaries (Draft EIR pages 3.0-1 through 3.0-7 and Figures 3.0-1 and 3.0-2).

- The project objectives (Draft EIR pages 3.0-19 and -20).

- The project characteristics, including the extent of the Plan area, Proposed Land Use Diagram, component of the policy document, planned roadway improvements and subsequent use of the Martis Valley Community Plan and its EIR for consideration of public and private development projects (Draft EIR pages 3.0-1 through 3.0-34).

- The anticipated required permits and approvals (Draft EIR pages 3.0-37 and –38).

Detailed descriptions of the existing environmental and development setting conditions of the Plan area and the surrounding areas (e.g., Town of Truckee and the Tahoe Basin) as well as the environmental effects of the Martis Valley Community Plan Update are provided throughout Sections 4.1 through 4.12 of the Draft EIR in conformance with CEQA Guidelines Section. However, these descriptions and analyses are not required by CEQA to be placed in the EIR project description.

As described above and in Section 3.0 (Project Description) of the Draft EIR, the project description for the Martis Valley Community Plan Update fully describes all aspects of the adoption of the Community Plan as well as reasonably foreseeable actions as a result of the project consistent with CEQA Guidelines Sections 15124 and 15378(a) and case law.

Martis Valley Community Plan Update Consideration of Development Projects Proposed Within the Plan Area and Placer Legacy

As previously described above, several comment letters have suggested that the Martis Valley Community Plan Update and its EIR needed to incorporate and consider proposed development projects in the Plan area, such as those proposed in Northstar-at-Tahoe resort community and elsewhere (e.g., Sawmill Heights, Highlands, conceptual development identified in the "Completing the Vision at Northstar" document, Hopkins Ranch, and Eaglewood). These projects and other large-scale development planned and/or proposed in the Plan area and in the region known at the time of release of the Draft EIR was specifically identified in the Draft EIR (Draft EIR pages 3.0-11 through –17 and 4.0-2 through –7). In addition, the Draft EIR impact analysis took into account proposed golf course and ski terrain

development currently proposed by projects within the Plan area, but that is not specifically proposed by the Martis Valley Community Plan (Draft EIR pages 4.0-2 through –7, 4.4-29 through –33, 4.7-37 through –73, 4.9-39 and 4.12-12 through –37). While the proposed Community Plan does not specifically identify or promote proposed major development projects (i.e., Hopkins Ranch, Eaglewood, Siller Ranch, Northstar Village, Northstar Highlands and Sawmill Heights) in the Plan area currently under consideration by the County, these projects are generally consistent with the land use patterns and development intensity associated with the Proposed Land Use Diagram of the Martis Valley Community Plan Update.

Several comment letters express the concern that proposed development projects in the Plan area should not be considered until the completion of the Martis Valley Community Plan Update. Currently Placer County has not established a moratorium on the consideration or approval of development projects in the Martis Valley Community Plan area as part of the Community Plan update. As previously described above, aspects of these proposed projects (e.g., golf courses and potential ski terrain expansion) as well as their proposed density was considered in the Draft EIR.

Comment letters also have suggested that the Placer Legacy Program (development of joint natural community conservation plans/habitat conservation plans for the County) for the eastern portion of the County should be completed before adoption of the Martis Valley Community Plan. Regarding the Placer Legacy Program for the Martis Valley Community Plan area (included as part of phase 2 [Sierra Foothills-East Side Sierra Nevada]), commencement of phase 2 is not currently expected to commence until completion of the Martis Valley Community Plan Update. The Placer Legacy Program is the implementation of Placer County General Plan open space, agricultural and natural resource policies and is not intended to alter planned land use patterns set forth in the General Plan. Consideration of projects are allowed to proceed under the Natural Community Conservation Planning Agreement for the Placer Legacy Open Space and Agricultural Conservation Program as long as they do not compromise the Placer Legacy Program and that wildlife agencies (e.g., California Department of Fish and Game and U.S. Fish and Wildlife Service) be provided opportunity to comment on the development projects (Section 7, Interim Project, Natural Community Conservation Planning Agreement). The Draft EIR adequately addresses the natural resource and biological effects of the project and provides data regarding habitat conditions in the Plan area for County and wildlife agency consideration. The Draft EIR was made available to California Department of Fish and Game and U.S. Fish and Wildlife Service for review and comment. To date, neither agency has identified that the Martis Valley Community Plan would compromise the future Placer Legacy Program for phase 2. Implementation of the proposed project is not expected to result in significant conflicts with the objectives of the Placer Legacy Program that are set forth in the Natural Community Conservation Planning Agreement.

3.4.2 ASSUMPTIONS USED FOR DEVELOPMENT CONDITIONS IN THE PLAN AREA

Several comment letters suggest that the development assumptions used in the Martis Valley Community Plan and the Draft EIR underestimate the development potential of the Plan area in the areas of residential development potential (number of dwelling units expected at buildout, permanent occupancy rates and persons per household) as well as commercial development (anticipated amount of square footage). The following is a further discussion of the residential and commercial buildout assumptions used in the Draft EIR.

Residential Development Assumptions

Use of the 20 Percent Reduction Factor for Gross Residential Land Areas

Several commentors suggested that the Draft EIR and the proposed Martis Valley Community Plan Update understates the amount of potential residential development that could occur under the various land use designations and question the use of 20 percent reduction for consideration of land area lost to roadways, open space, physical land constraints (e.g., waterways and steep slopes), landscaping, infrastructure and other supporting facilities. Draft EIR tables 3.0-2 through 3.0-4 (Draft EIR pages 3.0-20 through –23) identify the anticipated holding capacities under each land use map option. Use of a 20 percent reduction on gross land area in order to account for land area lost to roadways, open space, physical land constraints (e.g., waterways and steep slopes), landscaping, infrastructure and other supporting facilities is a common practice by cities and counties in order to estimate actual development potential. As shown in tables 3.0-2 through 3.0-4 and figures 3.0-5 through 3.0-8 of the Draft EIR (Draft EIR pages 3.0-20 through –31), the land use plan options generally do take into account existing and proposed development densities and patterns (e.g., Hopkins Ranch, Eaglewood, Northstar-at-Tahoe, Siller Ranch Lahontan I and II) in the computation of the anticipated holding capacities without factoring in the 20 percent reduction. However, in areas where no details regarding the anticipated residential development pattern were available, the use of a 20 percent reduction factor was appropriate and utilized. The use of the 20 percent reduction factor is consistent with factors used by the County in the Placer County General Plan (Placer County General Plan Background Report Volume 1 pages 1-34 through –39).

Use of Residential Density Ranges and Property Owner Holding Capacity Requests in Buildout Estimates for Plan Area

Several commentors also questioned the residential density factors by residential land use designation and by property used to determine the anticipated holding capacity of the Plan area in regards to why higher factors were not used. As identified in tables 3.0-2 through 3.0-4 of the Draft EIR, residential land use designations under each of the land use map options provide for a range of residential densities. The commentors are correct that under the Proposed Land Use Diagram and the Alternative 2 Land Use Map residential density factors used for the Low Density Residential (LDR, 1 to 5 dwelling units per acre) and Medium Density Residential (MDR, 5 to 10 dwelling units per acre) in the Draft EIR were not at the high end of the allowed density ranges. These lower density ranges were used by the County to reflect current and historic densities that these land use designations buildout at (i.e., 3 dwelling units per acre for LDR and 6 dwelling units per acre for MDR). For example, Lahontan I and II consist of approximately 413 acres that would be designated Low Density Residential (1 to 5 dwelling units per acre) under Proposed Land Use Diagram. These projects were approved with a total development potential of 537 dwelling units, which consists of a 1.3 dwelling unit per acre density, which is lower than the factors used in the Draft EIR. In addition, the Ponderosa Palisades/Sierra Meadows area would be designated primarily LDR with two small areas designated MDR and Rural Residential (RR, 0.4 to 1 dwelling unit per acre). This area is largely built out at a 1.3 dwelling unit per acre density.

As noted in tables 3.0-2 and 3.0-4 of the Draft EIR, the Proposed Land Use Diagram and Alternative 2 Land Use Map take into account holding capacity requests of individual property owners within the Plan area that lower than what is currently allowed under the 1975 Martis Valley General Plan. Subsequent development under the Martis Valley Community Plan would on these properties would be required to be consistent with the land use designations, zoning

and holding capacities set forth in the Community Plan in order to avoid consideration of a rezone, General Plan and Community Plan amendments and reevaluation of project impacts beyond what was considered under the Martis Valley Community Plan Update EIR. Current applications for consideration of residential development projects in the Plan area have been submitted for Hopkins Ranch (proposing 65 dwelling units), Eaglewood (proposing 462 dwelling units), Siller Ranch (726 dwelling units), Northstar Village (proposing 213 dwelling units) and Northstar-at-Tahoe Highlands Project (proposed 1,866 dwelling units) that are less than what is currently proposed under these land use map options. Thus, it is not expected that implementation of the Martis Valley Community Plan and subsequent development consistent with the Community Plan would result in residential development beyond what has been considered in the Draft EIR.

Assumptions Associated with Permanent Versus Seasonal Occupancy of Residential Units

Several commentors have suggested that the Draft EIR's assumption that the occupancy rates of the residential units in the Plan area (20 percent permanent residency and 80 seasonal residency of the total units in the Plan area) are too low and thus understates the extent of permanent population that would occur and the associated environmental effects. As described in Section 4.2 (Population/Housing/Employment) of the Draft EIR, existing and current development in the area is primarily associated with the tourist/recreational resort aspects of the region (e.g., tourist destinations and winter and summer outdoor recreation opportunities). Thus, housing in the area primarily consists of second homes (i.e., seasonal use). While U.S. Census data for the larger region identifies a permanent residency rate ranging from 29 to 53 percent (Draft EIR page 4.2-7), estimates within the Plan area show permanent residency rates at 6 to 7 percent currently in the Northstar-at-Tahoe resort community (Martis Valley Community Plan Background Report page 3-4). Given these low permanent residency rates, the County assumed that the Plan area would generally have a permanent residency rate of 20 percent and an 80 percent seasonal residency rate at buildout of purposes of the Draft EIR analysis. One exception to this assumed occupancy rate at buildout for the Plan area was considered in the traffic analysis for the Ponderosa Palisades/Sierra Meadows area where existing traffic volumes in this area identified an occupancy rate of 80 percent permanent residency and 20 percent seasonal residency. Given the cost of housing in the Plan area ($115,000 to $2,500,000, Martis Valley Community Plan Background Report pages 3-10 and –11) and lack of large wage earner employment base that can support area cost of living expenses, it is not expected that the Plan area would consist primarily of permanent residents.

While the Draft EIR generally assumes a 20 percent permanent residency and 80 percent seasonal residency of the total units in the Plan area, the impact analyses provided in the Draft EIR evaluates the environmental effects of Plan area dwelling units at full occupancy. This was specifically addressed in the impact analysis in the Draft EIR in Sections 4.2 (Draft EIR pages 4.2-15 through –28), 4.4 (Draft EIR pages 4.4-29 through –73), 4.5 (Draft EIR pages 4.5-20 through –34[traffic noise impacts]), 4.6 (Draft EIR pages 4.6-12 through –20), 4.7 (Draft EIR pages 4.7-54 through –72), and 4.11 (Draft EIR pages 4.11-7 through –16; 4.11-46 through –51; 4.11-56 through –62; 4.11-70 through –80; 4.11-87 through –92). There are only three impact discussions in the Draft EIR that are solely based on the use of the 20 percent permanent residency rate, law enforcement (Impacts 4.11.2.3 and 4.11.2.2, Draft EIR pages 4.11-20 through –24), public schools (Impacts 4.11.3.1 and 4.11.3.2, Draft EIR pages 4.11-32 through –38) and solid waste services (Impacts 4.11.6.1 and 4.11.6.2, Draft EIR pages 4.11-64 through –68). These public service impacts are more related to the effects of a permanent population, rather than season populations. However, based on further review of information associated with these public

services and consultation with service providers, no significant physical effects on the environment would occur if full occupancy were assumed. Consultations with the Placer County Sheriff's Department has identified that subsequent development under the Martis Valley Community Plan and the associated increase in law enforcement service demands would be offset by existing funding mechanisms (property tax, building impact fees, facility impact fees and bonds) and that the Community Plan would not solely trigger the need for additional facilities that could cause a physical effect on the environment. Public school impacts of subsequent development under the Martis Valley Community Plan would be offset by existing state funding, bond measures within the Tahoe Truckee Unified School District and compliance with applicable Community Plan policies and implementation programs per California Government Code Sections 65995(h) and 65996(b). Tahoe-Truckee Sierra Disposal has a 200-year contract with the landfill facility in Lockwood, Nevada, which has a current estimated capacity of 60 years, which could accommodate waste generated from full occupancy of the Plan area.

Assumptions Associated with Persons Per Household

Several commentors suggested that the persons per household average used in the Draft EIR was too low and did not take into account persons per household in vacation households. The persons per household factor is based on U.S. Census data (Draft EIR page 4.2-15). The Draft EIR consideration of persons per household is focused on the project's permanent resident population and its consistency with the Placer County General Plan holding capacity projections (Draft EIR page 4.2-16). The Draft EIR acknowledges that during peak winter and summer periods there will be an increase in activities in the Plan area associated with temporary increases in area population, which the environmental effects of these peak periods has been evaluated in Sections 4.4 (Transportation and Circulation), 4.5 (Noise) and 4.6 (Air Quality).

Commercial Development Assumptions

Several commentors have suggested that the estimated commercial and office development in the Plan area understate the amount of actual development that occur could, thus the environmental analysis of this development potential understates the impact. While the Placer County General Plan identifies that general commercial and tourist/resort commercial uses could have maximum floor area ratios (FARs) from 0.80 to 2.00, current and historic commercial and office development patterns in the County have not resulted in such FARs. This is the result of parking and landscaping requirements that generally require one parking space per 300 to 1,500 square feet of commercial/office space (Placer County Zoning Ordinance, Section 17.54.060). While such FARs do occur in dense urban centers, they are not as common in low density urban and rural area conditions found in the Plan area. The use of 0.25 FAR is considered more reflective of commercial conditions expected in the Plan area and thus was used in the Draft EIR. As an example, the proposed Northstar Village expansion (if approved) will result in a commercial FAR of approximately 0.20, while commercial FARs in the City of Reno are estimated at 0.20 FAR (Cologna, 2003). Given the low urban/rural nature of land use designations under the Martis Valley Community Plan, County parking and landscaping requirements, current commercial development patterns in the County and development constraints (e.g., topographic, water features and climatic conditions [e.g., designing for snow loads for roofs]), it is not expected that all commercial development within the Plan area would develop at 0.80 to 2.00 FARs and that the use of 0.25 FAR is an appropriate estimation of potential commercial development.

It should also be noted that Martis Valley Community Plan specifically notes the County's desire to limit large single use commercial facilities (greater than 35,000 square feet) in the Plan area (Policy 1.C.6) and recognizes the Town of Truckee as the hub of services for the area (Policy 1.A.5).

3.4.3 WATER QUALITY

Several comment letters expressed the concern that the Draft EIR did not adequately address surface water quality effects of the project and/or mitigation measures proposed in the Draft EIR are not adequate or lack adequate detail to ensure no increases in surface water pollutant conditions. Section 4.7 (Hydrology and Water Quality) of the Draft EIR provides an extensive analysis of surface water quality and potential impacts associated with implementation of the project. This includes consideration of water quality impacts associated with construction (e.g., sediment and accidental spills of oil and grease) (Draft EIR pages 4.7-30 through –37), operational water quality impacts (e.g., use of fertilizers, herbicides and pesticides, operation of golf courses in the Plan area, sedimentation and snow removal) (Draft EIR pages 4.7-37 through –44), groundwater quality impacts (e.g., urban-type run-off that infiltrates and use of chemicals and fertilizers) (Draft EIR pages 4.7-44 through –50).

Several commentors also suggested that the Draft EIR quantify the water quality effect of subsequent development nonpoint drainage discharges into the Martis Creek watershed of the Plan area. Section 4.7 (Hydrology and Water Quality) of the Draft EIR specifically notes the extent of land disturbance (3,500 acres to 4,900 acres) and development planned (see Figures 3.0-5 through 3.0-8 of the Draft EIR, pages 3.0-25 through –32) for under the various land use map options identified as part of the proposed Martis Valley Community Plan, including consideration of conceptual ski terrain expansions associated with the Northstar-at-Tahoe area (i.e., Northstar-at-Tahoe Completing the Vision and potential ski terrain improvements associated with Siller Ranch) (Draft EIR pages 4.7-30 through –73). The Draft EIR also identifies the type of potential pollutants that could be released into the Martis Creek watershed (Draft EIR pages 4.7-30 through –73). However, it is not possible at the Community Plan level to accurately estimate exact changes in pollutant loads in the Martis Creek watershed as a result of subsequent development regulated under the proposed Martis Valley Community Plan. As further described below, development of the Lahontan community has not resulted in any statistically significant difference in water quality conditions in Martis Creek as a result of implementation of effective Best Management Practices (BMPs). While future development of the Plan area has the potential to significantly impact water quality, appropriate site development and use of BMPs can reduce and avoid significant water quality impacts.

Since release of the Draft EIR, the County has obtained and reviewed extensive information regarding current water quality conditions in Martis Valley. This information includes Cumulative Water Quality Analysis Report for Lahontan Development (1996-2002) (Huffman & Carpenter, Inc., 2003), water quality monitoring data from Northstar-at-Tahoe as part of its compliance with its Waste Discharge Requirements from the Lahontan Regional Water Quality Control Board (RWQCB) (Board Order No. 6-93-89, WDID No. 6A319306003) and Annual Water Quality Reports for Martis Creek Lake prepared by the U.S. Army Corps of Engineers. Water quality sampling monitoring data from the reports associated with Northstar-at-Tahoe and the Lahontan community has been routinely submitted to the Lahontan Regional Water Quality Control Board. The following text changes are made to the Draft EIR to include this surface water quality data as well as the status of Martis Creek being on the RWQCB's "Watch List" for nutrients:

- Page 4.7-8, the following text revisions are made to the Draft EIR:

"WATER QUALITY

Currently, water quality associated with Martis Creek and its tributaries are monitored as part of the chemical application management plan for Lahontan golf course as well as by Northstar-at-Tahoe as part of its compliance with its Waste Discharge Requirements from the Lahontan Regional Water Quality Control Board (RWQCB) (Board Order No. 6-93-89, WDID No. 6A319306003). **Table 4.7-1** summarizes water quality sampling along West Martis Creek. Sampling of the water quality of Martis Creek associated with the Lahontan development has been conducted on a quarterly basis for six years. This monitoring includes sampling of surface water quality of Martis Creek upstream of Lahontan, sampling within Lahontan along Martis Creek and associated tributaries and sampling downstream of Lahontan. **Figures 4.7-4** through **4.7-12** show historic water quality sampling data for Martis Creek in the Lahontan area.

Cumulative Water Quality Analysis Report for Lahontan Development (1996-2002) provides a summary and analysis of water quality monitoring data on Martis Creek collected for the Lahontan development from 1996 to the second quarter of 2002 for the following constituents to determine the effectives of Lahontan's water quality control measures (see **Figures 4.7-4** through **4.7-12**):

- Total Kjeldahl nitrogen (TKN)
- Nitrite/nitrate (NO_{2-3}-N)
- Sulfate (SO_4)
- Total dissolved solids (TDS)
- Chloride (Cl)
- Iron (Fe)
- Total nitrogen (N)
- Total phosphorus (TP)
- Boron (B)

Insert figure 4.7-4, page 1 of 2

Insert figure 4.7-4, page 2 of 2

Insert figure 4.7-5, page 1 of 2

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Insert figure 4.7-12, page 1 of 2

Insert figure 4.7-12, page 2 of 2

TABLE 4.7-1
WATER QUALITY SAMPLING FOR WEST MARTIS CREEK

		Constituents – Average Concentrations mg/l									
Sampling Period	[1]	TDS[4]	Oil/Grease	TSS[2]	Turbidity[3] NTU	Nitrate	Nitrite	TKN	P	Cl	Fe
1994 (April-Oct)	N1	100.20	0.05	17.60	5.48	0.15	0.11	0.25	<0.10	3.78	231.12
	N2	107.40	0.05	<10.00	3.22	0.07	0.10	0.32	<0.10	2.28	375.00
	N3	100.80	0.12	16.00	9.64	0.10	0.10	0.32	<0.10	4.17	519.20
1995 (April-July)	N1	83.18	3.00	34.77	8.59	0.15	0.02	0.07	0.06	1.55	0.50
	N2	82.64	5.00	9.60	3.25	0.09	0.02	0.06	0.03	2.28	0.21
	N3	71.00	3.09	14.41	6.72	0.09	0.02	0.06	0.04	2.23	0.23
1996 (May-June)	N1	74.60	1.00	9.00	1.42	<0.10	<0.02	0.18	0.03	0.64	0.25
	N2	77.60	<1.00	7.00	1.56	<0.10	<0.02	0.60	0.02	1.12	0.24
	N3	75.80	1.00	9.00	2.70	<0.10	<0.02	0.11	0.03	1.18	0.23
1997 (April-June)	N1	130.00	<5.00	9.88	0.93	0.15	0.13	<0.10	0.04	0.71	0.16
	N2	76.75	<5.00	4.00	0.75	0.15	0.13	<0.10	0.04	1.30	0.16
	N3	77.75	<5.00	4.13	1.08	0.14	0.13	<0.10	0.04	1.31	0.17
1998 (May-July)	N1	82.80	<5.00	8.20	1.90	0.20	0.14	0.11	0.04	NR	NR
	N2	86.30	<5.00	3.90	1.14	0.14	0.14	0.10	0.04	NR	NR
	N3	81.60	<5.00	10.00	6.56	0.12	0.14	0.09	0.04	NR	NR
1999 (May-June)	N1	87.33	<5.00	19.22	6.15	0.18	<0.10	0.38	0.03	NR	NR
	N2	53.56	<5.00	5.33	1.56	0.10	<0.10	0.38	0.02	NR	NR
	N3	68.89	<5.00	15.33	4.80	0.10	<0.10	0.39	0.03	NR	NR
2001 (April-May)	N1	85.50	<5.00	31.00	12.20	0.42	0.16	0.33	0.05	NR	NR
	N2	71.75	<5.00	28.75	5.44	0.21	0.16	0.23	0.04	NR	NR
	N3	83.25	<5.00	14.00	3.28	0.26	0.16	0.27	0.03	NR	NR
2002 (April-May)	N1	88.14	<2.43	8.29	8.36	0.39	<0.05	0.27	0.03	NR	NR
	N2	64.57	<2.43	<5.00	0.45	<0.05	<0.05	0.23	0.01	NR	NR
	N3	169.71	<2.43	6.14	3.64	0.20	<0.05	0.17	0.02	NR	NR

[1] *Sampling locations: N1: adjacent to the NPOA Recreation Center, N2: tributary upstream of Reservoir A, N3: along the golf course at the 17th hole.*
[2] *Average value for samples for TSS were generally impacted by large TSS concentrations in the spring months.*
[3] *Average value for samples for turbidity were generally impacted by large readings in the spring months.*
[4] *Average value for samples for TDS were generally impacted by large TDS concentrations in the spring months.*
Cl: Chloride
TDS: Total Dissolved Solids
TSS: Total Suspended Solids and/or Total Settleable Solids
TKN: Nitrogen, total Kjeldahl
P: Phosphorus, total
Fe: Iron
NR: No concentration reported.
Source: Haynes, 2002

As documented in the report, development and operation of the Lahontan development has not resulted in any statistically significant difference in water quality conditions in Martis Creek based on comparing upstream water quality conditions (identified as station 2 in the report) to downstream water quality conditions (identified as station 1 in the report), including constituents of current concern to the Lahontan Regional Water Quality Control Board (phosphorus and total dissolved solids) (Huffman

& Carpenter, Inc., 2003). As demonstrated by this report, implementation of appropriate water quality control measures (e.g., infiltration basins, implementation of a chemical management application plans and site design that allows overland flow of drainage across open space areas) and monitoring for development projects in the Martis Valley area can maintain existing water quality conditions.

Currently, the Truckee River is a listed waterway on California's Clean Water Act Section 303(d) list due to sediment and on the Lahontan Regional Water Quality Control Board's "Watch List" for chloride and TDS. The Lahontan Regional Water Quality Control Board is currently working on establishing the Total Maximum Daily Load (TMDL) for the Truckee River in order to identify reductions of sediment delivery into the river and to bring the waterway into attainment with applicable water quality standards. The Division of Hydrologic Sciences, Desert Research Institute (DRI) was retained by the RWQCB to prepare the Water Quality Assessment and Modeling of the California Portion of the Truckee River Basin (July 2001) in order to provide technical data for the development of the TMDL. The Water Quality Assessment and Modeling of the California Portion of the Truckee River Basin identifies that the Little Truckee, Martis, Prosser and Donner creeks are the major waterway contributors of suspended sediment to the Truckee River. The study also identified that northern and central areas in Placer County along Martis Creek have varying sediment load potential from 0.001 to 0.12 tons per square mile x 10^ -3. Also, areas closer to the Truckee River affect in-stream sediment concentrations the greatest and land areas of higher elevations (typically with steep slopes) produce higher sediment loads per unit area. Martis Creek is on the Lahontan Regional Water Quality Control Board's "Watch List" for nutrients."

~~Quality of surface waters is generally excellent in the upper reaches of the Plan area's stream network with few contaminants and nutrients. The Lahontan II Environmental Impact Report states that "grazing, which is presumably the source of elevated coliform levels in Martis Creek, is the only notable existing land use in the watershed that has perceivably affected runoff quality". However, the Tahoe-Truckee Sanitation Agency, which samples Martis Creek water twice monthly at 2 separate locations downstream of Martis Creek Lake, reports that fecal coliform levels do not support the presumption that grazing has affected runoff quality. In fact, fecal coliform levels during a monitoring period that lasted for 11 months from May 4, 1999 to April 3, 2000, did not exceed a value equal to 20 percent of the water quality objective for this constituent, as established by the Lahontan Regional Water Quality Control Board. As part of the water quality study commissioned by the Lahontan Region Water Quality Control (RWQCB) associated with establishing the Total Maximum Daily Load (TMDL) for sediment for the Truckee River Watershed, suspended sediment loads for Martis Creek were estimated at 635 tons in 1997 (Desert Research Institute, 2001). Per the DRI, their proposed future target for TMDL from Martis Creek drainage is 446 tons. Therefore, existing sediment loads must be decreased by 189 tons in order to achieve the desired objective.~~

~~Currently, the Truckee River is a listed waterway on California's Clean Water Act Section 303(d) list due to sediment. The Lahontan Regional Water Quality Control Board is currently working on establishing the TMDL for the Truckee River in order to identify reductions of sediment delivery into the river and to bring the waterway into attainment with applicable water quality standards. The Division of Hydrologic Sciences, Desert Research Institute was retained by the RWQCB to prepare the Water Quality Assessment and Modeling of the California Portion of the Truckee River Basin (July 2001) in order to~~

~~provide technical data for the development of the TMDL. The Water Quality Assessment and Modeling of the California Portion of the Truckee River Basin identifies that the Little Truckee, Prosser and Donner creeks are the major waterway contributors of suspended sediment to the Truckee River.~~

~~The study also identifies that the northern and central land areas of the Plan area along Martis Creek have varying sediment load potential (from 0.001 to 0.12 tons per square mile x 10^{A-3}), and that areas closer to the Truckee River affect in-stream sediment concentrations the greatest and land areas of higher elevations (typically with steep slopes) produce higher sediment loads per unit area.~~ "

Several comment letters also expressed concerns associated with potential impacts to groundwater quality associated with the upper aquifer that could in turn adversely effect surface waters (e.g., Martis Creek and Martis Creek Reservoir) and that the EIR needs to provide additional information regarding groundwater quality. Groundwater quality impacts (e.g., urban-type run-off that infiltrates and use of chemicals and fertilizers) of subsequent development under the Martis Valley Community was specifically addressed in Section 4.7 (Hydrology and Water Quality) of the Draft EIR (Draft EIR pages 4.7-44 through –50). Based on groundwater quality samples at an exploratory test hole on the Eaglewood property, water quality of the upper aquifer (175 feet below ground surface) was identified as follows:

Conductivity:	250 us/cm	Fluoride:	0.55 mg/l
PH:	7.49	Hardness:	71 mg/l
Total Arsenic:	<0.005 mg/l	Iron:	0.3 mg/l
Total Alkalinity:	110 mg/l	Magnesium:	0.014 mg/l
Bicarbonate:	94 mg/l	Nitrate:	0.5 mg/l
Carbonate:	16 mg/l	Potassium:	1.5 mg/l
Hydroxide:	<1 mg/l	Sodium:	37 mg/l
Calcium:	15 mg/l	Sulfate:	20 mg/l
Chloride:	4 mg/l	Total Dissolved Solids:	180 mg/l
Color:	50 color units	Turbidity:	10 NTU
Copper:	0.012 mg/l		

Based on this sample, groundwater quality in the upper aquifer would appear to meet drinking water standards with the exception of color (water sampled at 175 feet below ground surface had 50 color units, while the Maximum Contamination Level is 15 color units). In addition, this sampling identifies that groundwater within the upper aquifer has higher conductivity and turbidity and higher concentrations of chloride, copper, fluoride, iron, manganese, potassium,

sodium, sulfate and total dissolved solids than the middle/lower aquifer (Layne GeoSciences, 2003).

Several commentors also identified specific concerns associated with the transport of potential groundwater pollution from development to surface water features as a result of storm drainage water quality features (e.g., infiltration basins) as well as from chemical and fertilizer use (especially in regards to golf courses). Mitigation measure MM 4.7.2c specifically requires the implementation of chemical application management plans or a similar plan to ensure golf course design and operation does not result in surface and groundwater contamination. In addition, this mitigation measure requires monitoring of surface and groundwater conditions to ensure that no pollution is occurring. Use of drainage features, such as infiltration basins and overland flow of storm drainage through open space areas, provides for treatment of drainage through the filtering effect of vegetation and materials in the soil. This conclusion regarding groundwater is supported by the "Cumulative Water Quality Analysis Report for Lahontan Development (1996-2002)" as well as by the Fresno Nationwide Urban Runoff Project (NURP) (1984) and the August 1998 Fresno-Clovis Storm Water Quality Monitoring Program Technical Memorandum. The City of Fresno drainage system consists of a series of retention basins for stormwater disposal and groundwater recharge in an urban setting. The Fresno project was one of 28 projects nationwide initiated by the U.S. Environmental Protection Agency in 1978. Fresno was chosen because the receiving water for urban runoff is the groundwater, and the Fresno system could demonstrate the effectiveness of total retention and recharge of urban storm runoff. The NURP found no adverse impacts on the groundwater resulting from recharge of urban runoff. Of the metals and organic compounds tested, concentrations in the soil water and groundwater underlying the five basins tested (two of which had been in operation for more than 20 years) were well within the drinking water standards established by the Safe Drinking Water Act. Metals and organic compounds associated with the stormwater were lost within the first few feet of the soil of the basins. In addition, the California Storm Water Best Management Practice Handbook (Municipal) prepared by the Stormwater Quality Task Force identifies that infiltration systems for stormwater disposal (as proposed by the project) are effective in controlling storm water quality and have been successfully operated in communities for over two decades (Stormwater Quality Task Force, 1993).

Implementation of proposed Community Plan policies and implementation programs identified in Section 4.7 (Hydrology and Water Quality) of the Draft EIR and mitigation measures MM 4.7.1a through c, MM 4.7.2a through e and MM 4.7.3 would require construction and operational features of subsequent development to provide sufficient water quality control measures to ensure no increase in turbidity, sediment or other pollutant loads in natural waterways as a performance standard. In addition, these mitigation measures and Community Plan policies and implementation programs describe examples of Best Management Practices (e.g., use of chemical management application plans, use of infiltration basins, containment facilities to capture accidental spills, water quality control features for snow storage areas, integration of all impervious surfaces into the drainage system and construction stabilization measures). The use of performance standard mitigation is allowed under CEQA Guidelines 15126.4(a) and is supported by case law (*Sacramento Old City Association v. City Council of Sacramento* [3d. Dist. 1991] 229 Cal.App.3d 1011, 1028 [280 Cal.Rptr. 478]). As demonstrated by the "Cumulative Water Quality Analysis Report for Lahontan Development (1996-2002)", implementation of appropriate water quality control measures and monitoring for development projects in the Martis Valley area can maintain existing water quality conditions. Thus, Community Plan policies and implementation programs

as well as Draft EIR mitigation measures MM 4.7.1a through c, MM 4.7.2a through e and MM 4.7.3, which include the performance standard of no increase in turbidity, sediment or other pollutant loads in natural waterways are considered reasonable for ensuring no new impact to water quality.

The following text changes are made to water quality mitigation measures in the Draft EIR in order to clarify the performance standard associated with predevelopment water quality conditions:

- Pages 2.0-35 through –37 (Table 2.0-1), 4.7-36 through –43, and 8.0-6, the following text changes are made to mitigation measures MM 4.7.1b and MM 4.7.2a:

  "MM 4.7.1b The County shall require each subsequent project clearly identify specific water quality control measures for Plan area waterways during construction activities. Water quality control features and required on-going monitoring and reporting to the County and Lahontan Regional Water Quality Control Board as part of compliance with this measure shall demonstrate that the water quality controls will ensure no increase in predevelopment sediment or other pollutant loads~~~~ conditions in natural waterways and that storm water discharges are in compliance with all current requirements of the Lahontan Regional Water Quality Control Board (e.g., Water Quality Control Plan for the Lahontan Region)."

  "MM 4.7.2a The County shall require that each subsequent project develop a surface water quality control program to be incorporated into the project's storm water drainage system design. This program would specify the design of planned water quality facilities to be used in the project's drainage system, including details and methods for intercepting and improving surface water quality as well as maintenance of facilities, correcting deficiencies with water quality control features and monitoring and reporting to the County and Lahontan Regional Water Quality Control Board. Water quality control features (including water quality control features for golf courses [Mitigation Measure MM 4.7.2c]) shall demonstrate that the water quality controls will ensure no increase in predevelopment sediment or other pollutant loads~~~~ conditions in natural waterways and that storm water discharges are in compliance with all current requirements of the Lahontan Regional Water Quality Control Board."

3.4.4 WATER SUPPLY EFFECTS OF THE PROJECT

Several comment letters suggested that the water supply analysis in the Draft EIR was not adequate and did not fully address environmental effects associated with supplying water to future land uses under the Community Plan. This master response is divided into subtopics that addressed specific comments on water supply.

Identification of Adequate Water Supply Source

The water supply analysis provided in the Draft EIR is based on the Ground Water Availability in the Martis Valley Ground Water Basin Report as well as consultations with the Placer County Water Agency (PCWA) and the Northstar Community Services District (NCSD). As described in Section 4.11 (Public Services) of the Draft EIR, the water supply source for the Plan area would consist of surface water (natural springs and Reservoir A at Northstar-at-Tahoe) and groundwater (Draft EIR pages 4.11-38 through –43). The Ground Water Availability in the Martis Valley Ground Water Basin report identifies that there is a total of 24,700 acre-feet annually of groundwater in the Martis Valley Ground Water Basin that is available without changing the volume of water in storage over the long term (which includes drought year conditions) (Draft EIR page 4.7-55). The results of this report were independently reviewed in the Independent Appraisal of Martis Valley Ground Water Availability Report prepared by Kennedy/Jenks Consultants (Kennedy/Jenks, 2002). The Independent Appraisal of Martis Valley Ground Water Availability Report concluded that the results of the Nimbus report are conservative and generally accurate regarding the amount of groundwater available. However, the Kennedy/Jenks report notes that the Nimbus report may have underestimated the amount of groundwater available as a result of potential underestimation of groundwater recharge and discharge associated with watersheds in the basin. In addition to groundwater resources, PCWA has identified that approximately 6,000 acre-feet annually of surface water is expected to be available for use in Martis Valley upon execution of the Truckee River Operation Agreement as required under Public Law 101-618 (Truckee-Carson-Pyramid Lake Water Settlement Act). No technical reports have been submitted by commentors that counters the conclusions of the Nimbus report.

Effects of Global Warming on Water Supply Availability

Several commentors also expressed concerns regarding the effect of future global climate changes from global warming. In September 2000, the Pacific Institute for Studies in Development, Environment and Security released *Water: The Potential Consequences of Climate Variability and Change for the Water Resources of the United States*. This report estimated future effects of global climate changes from global warming on the nation's water resources. The report did not provide specific information or data regarding future effects on water resources and groundwater availability in Martis Valley. However, it did identify that temperature increases would likely alter precipitation and snowpack conditions in the western portion of the U.S. (including the Sierra Nevada mountains). The report identified that precipitation in California and the Sierra Nevada mountains may increase through the 21st century, but that snowpack conditions and extent of winter season would be reduced and spring runoff would occur earlier (Pacific Institute for Studies in Development, Environment and Security, 2000). However, none of the information provided in *Water: The Potential Consequences of Climate Variability and Change for the Water Resources of the United States* suggests that anticipated changes in global climate would substantially alter groundwater availability that has been estimated in the Nimbus report.

Estimation of Water Demands of Plan Area

Tables 4.7-4 through 4.7-7 of the Draft EIR detail anticipated water demands of the Plan area under each land use map option, including consideration of potential future snowmaking and golf course operation), and are based on PCWA water demand estimates specific by land use type (Draft EIR pages 4.7-55 through –58). These water demand estimates range from 7,401 to

8,349 acre-feet annually in the Plan area. Placer County Water Agency and the County estimates that regional water demand (Placer County, Nevada County, Town of Truckee) could range from 23,000 to 24,000 acre-feet annually, which would be adequately served by the available 24,700 acre-feet annually of groundwater supply and 6,000 acre-feet annually of surface water from the Truckee River (Toy, 2002). No technical data or reports have been submitted by commentors that counter the water demand estimates used by PCWA and the Draft EIR.

Effects on Surface Water Features from Increased Groundwater Production

The Draft EIR also addresses potential impacts to surface water conditions in the Martis Valley Community Plan area from increased groundwater production. As identified in the Draft EIR, there are two general aquifers in the Martis Valley Ground Water Basin consisting of an upper aquifer and the middle/lower aquifer. However, geologic conditions in the subsurface vary throughout the Basin that results in varying sized water-bearing formations, which occur at varying depths. Boring data from the installation of wells in the general vicinity of Schaffer Mill Road and the Truckee-Tahoe Airport have all identified water bearing formations (sediments associated with the Lousetown Formation and Truckee Formation) and non-bearing formations (lava associated with the Lousetown Formation Volcanics) associated with the upper and middle/lower aquifers at varying depths and thickness. Sections 5, 6 22, 23, 24, 25, 26, 27, 34, 35, 36 of the Martis Valley Community Plan area are located in areas of shallow bedrock consisting of lava, tuff, breccia and volcaniclastic deposits ranging from andesite to basalt. These bedrock conditions limit interaction between the upper and middle/lower aquifer. Test pits and well data (associated with geotechnical and well reports cited in the Draft EIR) in these areas verify that the depth to volcanic bedrock generally ranges from at the surface to 50 feet below the ground surface (Draft EIR page 4.7-51). The upper aquifer system is fed by year-round infiltration from flowing creeks and precipitation, and in turn, this aquifer feeds waterways (Truckee River) and local springs and wetland areas from groundwater discharge. The middle/lower aquifer begins at depths ranging from approximately 200 to 800 feet below ground surface level and is the primary aquifer utilized for domestic water use. The middle/lower aquifer is fed from transmission from areas adjoining the Basin as well as leakage from the surface through the upper aquifer and permeable geologic conditions and in turn appears to feed the Truckee River. However, the *Ground Water Availability in the Martis Valley Ground Water Basin Report* identifies that hydrogeologic and water level data indicates that the middle/lower aquifer responds as a confined aquifer (Draft EIR page 4.7-15). Since release of the Draft EIR, InterFlow Hydrology, Inc released a report titled *Measurement of Ground Water Discharge to Streams Tributary to the Truckee River in Martis Valley, Placer and Nevada Counties, California*. This report identifies that in addition to the 24,700 acre-feet annually of groundwater determined to be available in Martis Valley, there is approximately an additional 10,320 acre-feet annually of groundwater that is discharged to tributary streams in Martis Valley (InterFlow Hydrology, 2003). This includes Martis Creek, which is estimated to be fed by approximately 5,120 acre-feet annually of groundwater that is separate of the previously identified 24,700 acre-feet annually identified in the Nimbus report to be available for municipal use.

The Draft EIR Mitigation Measure MM 4.7.5 specifically requires that new and/or expanded well facilities be designed to not result in a substantial impact on surface water features consistent with Section 204(c)1B of Public Law 101-618. Based on the above mentioned available technical information regarding the hydrologic and geologic conditions of the Martis Valley Community Plan area and implementation of Mitigation Measure MM 4.7.5, increased

groundwater production as a result of subsequent development under the Community Plan under existing and cumulative conditions is not anticipated to result in any significant changes in surface water conditions in the project area as documented in the Draft EIR. No technical data or reports have been submitted by commentors that counter these conclusions of the Draft EIR.

Adequacy of Groundwater Quality for Water Supply Use

Several comment letters expressed concerns whether the groundwater quality in the Plan area would be adequate and identified specific water quality issues including arsenic (identified as an issue with well facilities serving the Glenshire area) as well as MTBE. As identified in Table 4.7-1 and page 4.7-15 of the Draft EIR, current groundwater quality conditions in the Plan area meets California Drinking Water Standards, including standards for arsenic. Elevated levels of arsenic are typically associated with utilizing groundwater from geologic units consisting of volcanic rock, while wells in the Plan area extend down approximately 1,000 feet below the ground surface within sediments associated with the Truckee Formation. As documented in Section 4.3 (Human Health/Risk of Upset) of the Draft EIR, there are no known cases of MTBE contamination in the Plan area. Given groundwater quality documented in the Draft EIR and anticipated enforcement of Drinking Water Standards, no significant groundwater quality impacts are expected.

Environmental Impacts Associated with Water Supply Infrastructure

Several comment letters identify concerns associated with the lack of identification of specific locations of future well and pipeline facilities and the lack of addressing the potential environmental effects of new water facilities. Planned and anticipated water supply facility improvements for the Plan area are identified on pages 4.11-39 through –43 of the Draft EIR. In regards these planned water supply facilities, a PCWA maintenance facility has been proposed within the Eaglewood property (as part of the proposed Eaglewood project) south of Schaffer Mill Road, and NCSD has tested a new well site within the Northstar-at-Tahoe golf course near the 7th hole fairway.

Well facilities, tanks and pipelines are expected to be placed within the development area of each property, unless connection to existing well and/or tank facilities is proposed (Draft EIR page 4.11-40). It is expected that water distribution pipelines would be placed within roadway right-of-ways, while well facilities would be located within or immediately adjacent to development areas. However, the exact location of all the required water supply facilities to serve buildout of the Plan area has not been determined or approved by PCWA or NCSD. The environmental effects of development of land areas within the Plan area in the Draft EIR includes consideration of associated infrastructure improvements to support the land use mixes identified under the various land use map options under consideration. Mitigation measures identified in the Draft EIR would also apply to any potential impacts identified for water distribution facilities.

3.4.5 ADEQUACY OF THE ALTERNATIVES ANALYSIS

Several comment letters have suggested that the Draft EIR's and the Revised Draft EIR's alternatives analysis is inadequate, should consider additional alternatives and is not in compliance with the requirements of CEQA. CEQA Guidelines Section 15126.6(a) states that an environmental impact report shall describe and analyze a range of reasonable alternatives to

a project. These alternatives should feasibly attain most of the basic objectives of the project, while avoiding or substantially lessening one or more of the significant environmental impacts of the project. An EIR need not consider every conceivable alternative to a project, nor is it required to consider alternatives that are infeasible. The discussion of alternatives in an EIR is intended to focus on those which are capable of avoiding or substantially lessening any significant effects of the project, even if they impede the attainment of the project objectives to some degree or would be more costly (CEQA Guidelines Section 15126.6[b]). In addition to provisions under CEQA, Section 18.20.030 of the Placer County Environmental Review Ordinance includes additional requirements associated with alternatives analysis, including consideration of alternative sites.

As described in Section 3.0 (Project Description) of the Draft EIR, the EIR evaluates the environmental effects of the Proposed Land Use Diagram (PP) along with the environmental effects of the Existing Martis Valley General Plan Land Use Map (AA), Alternative 1 Land Use Map (AB) and Alternative 2 Land Use Map (AC) at an equal level of detail throughout the technical analysis in Section 4.0 (Environmental Setting, Impacts and Mitigation Measures) of the Draft EIR. Table 6.0-1 of the Draft EIR provides a comparison of the environmental benefits and detriments of the Proposed Land Use Diagram in comparison to the three alternative land use maps.

In addition to these land use alternatives and in accordance with the provisions of CEQA Guidelines Section 15126.6, the Revised Draft EIR considered the environmental benefits and effects of the following additional alternatives. These alternatives are compared to the Proposed Land Use Diagram and its significant environmental impacts identified in Section 4.0 (Environmental Setting, Impacts and Mitigation Measures) of the Draft EIR:

- No Project Alternative
- Clustered Land Use Alternative
- Reduced Intensity Alternative
- Lowest Intensity Alternative

The alternatives analysis provided in the Revised Draft EIR provides a detailed comparison of the Proposed Land Use Diagram to the alternatives identified above consistent with and in beyond the requirements of CEQA (CEQA Guidelines 15126.6[d] identifies that the discussion of the significant effects of an alternative need not be as detailed as the analysis of the project). This master response is divided into subtopics that addressed specific comments on the alternatives analysis.

Adequacy of the Range of Alternatives Considered in the Draft EIR and Revised Draft EIR

Several commentors have suggested that the alternatives considered in the Draft EIR and Revised Draft EIR does not constitute a reasonable range of alternatives (i.e., alternatives to the project that could feasibly accomplish most of the basic project objectives and could avoid or lessen one or more of the significant environmental effects [CEQA Guidelines Section 15126.6{c}]) and fails to consider other suggested alternatives as required by CEQA. The alternatives considered in the Draft EIR and Revised Draft EIR are based on avoiding and/or reducing the significant environmental impacts of the Proposed Land Use Diagram, attempting to generally maintain the existing land use pattern set forth in the 1975 Martis Valley General Plan, 1994 Placer County General Plan and Placer County Zoning Ordinance, and maintain general consistency with the direction given by the Placer County Board of Supervisors regarding the Martis Valley Community Plan Update process and the objectives of the Martis

Valley Community Plan. A total of seven land use map alternatives have been considered with development intensities ranging from 11,668 dwelling units and approximately 1,681,000 square feet of commercial/office uses (No Project Alternative/Existing Martis Valley General Plan Land Use Map Alternative) to 5,383 dwelling units and approximately 1,091,000 square feet of commercial/office uses (Lowest Intensity Alternative) as compared to the Proposed Land Use Diagram (9,220 dwelling units and up to approximately 1,190,000 square feet of commercial/office uses). These alternatives are considered a reasonable range of alternatives for consideration in the EIR as defined by CEQA Guidelines Section 15126.6(c) and is generally consistent with the *Village Laguna of Laguna Beach v. Board of Supervisors* (4th Dist. 1982) 134Cal.App.3d 1022, 1028-1032[185 Cal.Rptr.41].

CEQA Guidelines 15126.6(c) specifically notes factors that may be considered to eliminate alternatives from detailed consideration in an EIR include:

(i) failure to meet most of the basic project objectives;

(ii) *infeasibility; or*

(iii) *inability to avoid significant environmental impacts.*

Several additional alternatives that were suggested by multiple commentors as appropriate for consideration in the EIR. These suggested alternatives are described and analyzed below.

Status Quo Alternative - This suggested alternative was generally described as limiting new development to that which could be accommodated at acceptable levels of service by all existing infrastructure. Since this alternative was not clearly defined by commentors in regards to details on land use mix, location of development and roadway improvements, it is difficult to evaluate the environmental benefits/detriments for environmental issue areas involving land disturbance (e.g., land use, hazards, hydrology and water quality, geology, biological resources, cultural/paleontological resources and visual resources/light and glare). As noted in Sections 4.7 (Hydrology and Water Quality) and 4.11 (Public Services) of the Draft EIR, there is currently or planned infrastructure facilities/service that can accommodate the development set forth in the Proposed Land Use Diagram. This includes adequate water supply (Draft EIR pages 4.7-54 through –73) and conceptual plans for water distribution facility improvements (Draft EIR pages 4.11-39 through –43); adequate wastewater service (Draft EIR pages 4.11-56 through –61); and electrical, natural gas and telephone service and infrastructure (Draft EIR pages 4.11-70 through –80). The Draft EIR does note that the Proposed Land Use Diagram, the Existing Martis Valley General Plan, Alternative 1 Land Use Map and the Alternative 2 Land Use Map would all require 4-lane widening of SR 267, Schaffer Mill Road and Northstar Drive within the Plan area (Draft EIR page 4.4-52), which could be the basis of defining the Status Quo Alternative. However, the Clustered Land Use Alternative, Reduced Intensity Alternative, and Lowest Intensity Alternative already consist of a reduction in land uses in the Plan area would avoid the need to widen these roadways in the Plan area. Intersection impacts and impacts to Interstate 80 identified in the Draft EIR are expected to occur with or without any new development in the Plan area. Thus, the identified critical component associated with this alternative (limiting new development to that which could be accommodated at acceptable levels of service by all existing infrastructure) is already a component of the Clustered Land Use Alternative, Reduced Intensity Alternative, and Lowest Intensity Alternative.

Biological and Natural Resources Alternative – This suggested alternative is described as using natural resource constraints mapping to avoid sensitive areas including ridgelines, significant ecological resource areas, wildlife corridors and maintenance of large unfragmented habitats and steep slopes. However, the commentors provide no specific detail on what areas should be avoided or details on land use mix, location of development and roadway improvements. It should be noted that the 1975 Martis Valley General Plan Land Use Map, which is the current land use mapping for the Plan area, was based on extensive constraints mapping. As identified in Figures 3.0-5 through 3.0-8 (Draft EIR pages 3.0-25 through –31) and Figure 4.8-1 (Draft EIR page 4.8-3) of the Draft EIR, the proposed Martis Valley Community Plan and the associate land use map options would not result in any residential, office or commercial development along the ridgelines of the Plan area, thus it is unclear why the ridgeline criteria for consideration of an additional alternative was identified by commentors. Section 4.9 (Biological Resources) of the Draft EIR also includes extensive information and mapping regarding the natural resources in the Plan area. Based on the information provided in Section 4.9 of the Draft EIR, "significant ecological resource areas" within the Plan area (as defined by Placer County General Plan Policy 6.C.1) includes wetlands and waterways associated with the Martis Creek watershed, deer migration corridors, nonfragmented stream environmental zones associated with Martis Creek and habitat areas within the Plan area known to contain special-status plant and animal species, which includes riparian habitat along Martis Creek within the U.S. Army Corps of Engineers property where willow flycatchers (*Empidonax traillii*) (state-listed endangered species) were recently identified (Holl, 2003) and known populations of plumas ivesia (*Iversia sericoleuca)* within the Great Basin sage scrub near SR 267. The commentors do not clarify what is considered a "steep slope". As identified in Figures 3.0-5 through 3.0-8 (Draft EIR pages 3.0-25 through –31) and Figure 4.8-2 (Draft EIR page 4.8-7), planned residential, office or commercial development under Martis Valley Community Plan and the associated land use map options would occur primarily in areas where slopes are less than 30 percent.

While the Proposed Land Use Diagram would not be completely consistent with the criteria identified by the commentors regarding this alternative, the Lowest Intensity Alternative (Figure 6.0-3 of the Revised Draft EIR) includes these features by providing Open Space and Forest land use designations along a majority of wetlands and waterway features as well as locations where known populations of plumas ivesia in the Plan area, would avoid large areas of existing riparian vegetation, would maintain known deer migration corridors and wildlife movement by providing large and connected areas of Open Space and Forest land use designations and clustering new development areas adjacent to existing development areas in the Plan area, and would limit development to areas with slopes ranging from 0 to under 30 percent. Thus, the critical components associated with this alternative (avoidance of sensitive areas including ridgelines, significant ecological resource areas, wildlife corridors and maintenance of large unfragmented habitats and steep slopes) are already included in the Lowest Intensity Alternative.

Conservation Plan Alternative – This alternative was specifically noted by comments received from Sierra Watch, Homeowners Engaged in Local Planning-Northstar and the Mountain Area Preservation Foundation with the assistance of the Conservation Biological Institute. The Conservation Plan Alternative is based on suggested conservation planning principals that were developed by the Conservation Biological Institute. While the commentors provide no specific detail on land use mix, specific location or density of

development and roadway improvements, the following summary of land use concepts for this alternative were identified:

- Prohibition of development currently designated under the Proposed Land Use Diagram located north and east of SR 267 (i.e., land areas currently owned by Sierra Pacific, Trimont, Waddle Ranch LLC and small property ownership) as well as areas west of SR 267, south of Martis Creek and west of Northstar (i.e., land areas associated with Siller Ranch).

- Cluster new development adjacent to existing development north of Martis Creek and in the Northstar-at-Tahoe resort community.

- Prohibit development on steep slopes, especially in the area of the headwaters of Martis Creek (the definition of "steep slopes" is not provided by the commentors).

- Maintain adequate setbacks from Martis Creek (no specific definition of adequate setbacks is provided by the commentors) and use recreational greenspace (e.g., parks and golf courses) as buffers from development and natural open space.

- Prohibit roads in conservation areas.

- Restrict residential density to meet existing infrastructure capacities and not place greater demands on the Tahoe Basin and national forests.

- Provide improvements to existing roadways (including SR 267) to improve wildlife movement.

- Consider removal of the dam at Martis Creek Reservoir and assist in restoring the Lahontan cutthroat trout to Martis Creek.

Based on the information provided above, this alternative land use map would be similar to the Lowest Intensity Alternative, with the exception of elimination of residential and commercial uses associated with the Waddle Ranch area and the southern portion of the Siller Ranch property. Thus, it is estimated that the Conservation Plan Alternative could consist of approximately 4,233 dwelling units and approximately 1,088,000 square feet of commercial and office uses at buildout. While the proposed Martis Valley Community Plan includes policies associated with supporting reestablishment of fisheries within the Plan area and protection of wildlife corridors, Placer County does not have the jurisdiction to implement removal of the dam at Martis Creek Reservoir or the installation of wildlife underpasses in SR 267. The environmental benefits and detriments of this alternative as compared to the Proposed Land Use Diagram based on the analysis of environmental issues in the Draft EIR are summarized below:

Land Use

The Conservation Plan Alternative could result in conflicts with the Truckee-Tahoe Airport operations as well as with Federal Aviation Regulations (FAR) Part 77 and the Tahoe Truckee Airport Comprehensive Land Use Plan similar to the Proposed Land Use Diagram. The alternative would result in reduced impacts associated conversion and

conflict potential with forestry uses as a result of the reduced extent of extensive development in the Plan area than the Proposed Land Use Diagram.

Population/Housing/Employment

Implementation of the Conservation Plan Alternative would result in less development and housing than the Proposed Land Use Diagram. This alternative would also result in similar affordable and employee housing impacts as the Proposed Land Use Diagram, though its jobs-housing ratio would be worse (5.51 versus 2.56) given the potential generation of approximately 4,671 fulltime equivalent employee jobs. The direct environmental effects associated with this impact would consist of increases in traffic and associated air quality emissions and increases in traffic noise from employees having to travel outside of the Plan Area for housing, which were addressed in Sections 4.4 (Transportation and Circulation), 4.5 (Noise) and 4.6 (Air Quality) of the Draft EIR, would be more severe under this alternative.

Human Health/Risk of Upset

The Conservation Plan Alternative would result in a smaller land area for disturbance and reduced development than the Proposed Land Use Diagram, especially in the Northstar area where mining facilities have been identified. Thus, this alternative would reduced hazard impacts associated with potential abandoned mine sites. Both this alternative and the Proposed Land Use Diagram land uses would result in comparable impacts regarding potential exposure to hazardous material contamination given that their mix of land use types are similar. Both the Conservation Plan Alternative and the Proposed Land Use Diagram land uses would result in comparable impacts regarding potential safety hazards with land use proximity to the Truckee-Tahoe Airport given that their mix of land uses are similar near the airport.

Transportation and Circulation

The Conservation Plan Alternative would generate 34 percent less traffic during the peak hour over the average day than the Proposed Land Use Diagram land uses in the Plan area, which would result in reduced traffic impacts including the avoiding the need to widen Schaffer Mill Road, Northstar Drive and SR 267 to 4 lanes.

Noise

Both the Conservation Plan Alternative and the Proposed Land Use Diagram would have similar construction noise impacts, given the similarity in land use mix and pattern and proximity to existing noise sensitive land uses (residential). The Conservation Plan Alternative would result in a 34 percent reduction in peak hour traffic volumes as compared to the Proposed Land Use Diagram, which would result in some reductions in traffic noise levels that are anticipated under the Proposed Land Use Diagram for year 2021 conditions. This alternative would result in similar potential airport noise impacts as the Proposed Land Use Diagram, given the similarity in land use mix and pattern and proximity of noise sensitive land uses (residential) to the airport.

Air Quality

The Conservation Plan Alternative is expected to result in reduced construction air quality impacts as compared to the Proposed Land Use Diagram, given the reduced amount of land area anticipated to be disturbed from development. This alternative would result in reduced air pollutant emissions ranging from 35 to 53 percent for criteria air pollutants under summer and winter conditions as compared to the Proposed Land Use Diagram. The Conservation Plan Alternative would also result in reduced PM_{10} emissions by approximately 273 pounds per day during the summer and approximately 2,886 pounds per day during the winter as compared to the Proposed Land Use Diagram.

Hydrology and Water Quality

The Conservation Plan Alternative is expected to result in reduced construction water quality impacts as compared to the Proposed Land Use Diagram, given the reduced amount of land area anticipated to be disturbed from extensive development. This alternative is expected to result in reduced operational water quality impacts as compared to the Proposed Land Use Diagram, given the reduced amount of land area anticipated to be extensively developed. The Conservation Plan Alternative is also expected to result in similar groundwater quality impacts as compared to the Proposed Land Use Diagram, given the land use mix is similar to the Proposed Land Use Diagram. This alternative would result in reduced water demand of approximately 2,863 acre-feet annually as compared to the Proposed Land Use Diagram (future potential golf courses at Hopkins Ranch, Siller Ranch and Eaglewood, existing and future snow-making were assumed in the water demand for this alternative). However, adequate groundwater and surface water supplies exist to serve both options.

Geology and Soils

Both the Conservation Plan Alternative and the Proposed Land Use Diagram land uses would result in comparable impacts regarding potential seismic hazards, given that their land use patterns are similar and include sensitive land uses in areas where faults are suspected. The Conservation Plan Alternative is expected to result in reduced soil erosion impacts as compared to the Proposed Land Use Diagram, given the reduced amount of land area anticipated to be extensively developed. This alternative would reduce the amount of land area for potential development in areas identified as having avalanche hazard potential (north facing slopes in areas with 30 percent and greater slopes) as compared to the Proposed Land Use Diagram.

Biological Resources

The Conservation Plan Alternative would result in less land disturbance from extensive development than the Proposed Land Use Diagram that could support identified special-status plant species habitat (Great Basin scrub, mixed coniferous forest, montane meadow, and ruderal habitats), but would still have potential to impact special-status plant species (Donner Pass buckwheat, plumas ivesia, Carson Range rock cress, long-petaled lewisia, Munroe's desert mallow and American manna grass). The Conservation Plan Alternative would result likely avoid impacts regarding potential impacts to the mountain yellow-legged frog and the Lahontan cutthroat trout as compared to the Proposed Land Use Diagram, given the reduced effects to Martis Creek and its tributaries.

The Conservation Plan Alternative would result in less land disturbance from extensive development than the Proposed Land Use Diagram and would have less potential to impact nesting raptors and other migratory birds (e.g., northern goshawk, American peregrine falcon [federal and state listed species], California spotted owl, Cooper's hawk, red-tailed hawk, yellow warbler and little willow flycatcher [state listed species]). This alternative would also have less potential to impact special-status bat species (spotted bat, long-eared myotis, fringed myotis, long-legged myotis, Yuma myotis, Pale Townsend's big-eared bat, Sierra Nevada red fox (state listed species), California wolverine (state listed species), Sierra Nevada snowshoe hare, pacific fisher, Sierra Nevada mountain beaver and pine marten. The Conservation Plan Alternative would reduce potential impacts to the western migration corridor of deer associated with the Verdi subunit of the Loyalton-Truckee deer herd as compared to the Proposed Land Use Diagram, given the additional open space provided under this alternative.

The Conservation Plan Alternative would result in reduced land disturbance from extensive development than the Proposed Land Use Diagram and would have a reduced contribution to cumulative biological resource impacts in the region as described under impacts 4.9.3, 4.9.4, 4.9.5, 4.9.6, 4.9.7, 4.9.8 and 4.9.11 in the Draft EIR for the Proposed Land Use Diagram.

Cultural and Paleontological Resources

The Conservation Plan Alternative is expected to result in a reduced potential for cultural resource impacts as compared to the Proposed Land Use Diagram, given the reduced amount of land area anticipated to be extensively developed.

Both the Conservation Plan Alternative and the Proposed Land Use Diagram land uses would result in comparable impacts regarding potential paleontological resource impacts, given that both land use options have similar land use patterns in the valley portion of the Plan area that contain the Pleistocene nonmarine sedimentary rocks (Prosser Creek Alluvium) and Quaternary alluvium geologic units, which are considered to have a high paleontological resource potential. However, the Conservation Plan Alternative would provide for more acreage designated Open Space and Forest than the Proposed Land Use Diagram in the valley portion of the Plan area, which would reduce its potential to impact undiscovered paleontological resources in the valley portion of the Plan area.

Public Services

The Conservation Plan Alternative is expected to result in less severe fire protection and emergency services impacts than the Proposed Land Use Diagram as a result of designating less development outside of the existing service areas of the Truckee Fire Protection District and the Northstar Community Services District (see Figure 4.11-1 of the Draft EIR). The Conservation Plan Alternative is also expected to result in less severe water facility and distribution impacts than the Proposed Land Use Diagram as a result of decreased development potential and associated reductions in water demand and service.

The Conservation Plan Alternative is expected to result in less severe utility extension impacts than the Proposed Land Use Diagram as a result of decreased development potential and provision of utilities into undeveloped areas. This alternative is also

expected to result in less severe park recreation demand impacts than the Proposed Land Use Diagram as a result of decreased development potential.

Visual Resources

The Conservation Plan Alternative is expected to result in reduced visual impacts than the Proposed Land Use Diagram as a result of reduced extent of development in the Plan area. This alternative could result in similar daytime glare impacts as the Proposed Land Use Diagram, given that this alternative has a land use pattern similar to the Proposed Land Use Diagram. The Conservation Plan Alternative would also result in reduced nighttime lighting impacts than the Proposed Land Use Diagram, given the decreased density of development within the Plan area. This alternative is expected to contribute to reduced cumulative visual impacts than the Proposed Land Use Diagram as a result of decreased density of development within the Plan area.

As described above, the Conservation Plan Alternative would result reduced environmental effects as compared to the Proposed Land Use Diagram. However, this alternative would result in a 55 percent reduction in residential development potential and may not be considered in conformance with the direction given by the Board of Supervisors that no major changes are made to the existing land use plan as part of the update of the Martis Valley General Plan (1975). In addition, this alternative may be considered to be less than adequate to meet Goal 1.B of the proposed Martis Valley Community Plan, which states:

To provide adequate land in a range of residential densities to accommodate the housing needs of all income groups expected to reside in Martis Valley.

As identified in Section 3.0 (Project Description) of the Draft EIR, this Goal consists of a key portion of the intent of the Martis Valley Community Plan. Thus, this alternative may be considered infeasible as set forth in CEQA Guidelines 15126.6(c).

Restricted Development/Transfer Development Rights Alternative – This alternative is described by commentors as limiting new development in the Plan area and transferring development rights into the Town of Truckee. The commentors provide no specific detail on land use mix, specific location or density of development and roadway improvements or what existing development areas should be transferred to the Town of Truckee. This alternative was considered and rejected in the Revised Draft EIR (Revised Draft EIR pages 6.0-1 and –2). As noted in the Revised Draft EIR, the Town of Truckee and Placer County do not have an established program for transferring development rights between the jurisdictions. Transferring of development rights from the Plan area would be inconsistent with the direction given by the Placer County Board of Supervisors regarding the Martis Valley Community Plan Update. The direction given by the Placer County Board of Supervisors regarding the Martis Valley Community Plan Update process did not include major changes to the land use designations, as it has been recognized for some time by the County that such changes are not appropriate, and that the previous land use plan, with minor changes, is still current for this area (Placer County, 1998). Such an alternative would also not be consistent with the basic objectives of the project (land use goals set forth in Section 2 [Land Use] of the proposed Martis Valley Community Plan associated with the general intent of the Plan). It should also be noted that as part of the findings for CEQA made when Placer County adopted the 1994 Placer County General Plan, the County identified that Alternative 1 (New Urban Growth to the Cities) was rejected as infeasible

because it did not meet objectives of the General Plan (opportunities for a mix of housing [including affordable], business development in the unincorporated area) (Placer County, 1994).

Further Reduced Development/Clustered Alternatives – Several comment letters suggested a variety of low intensity development and clustered alternatives that generally varied from 1,000 to 3,000 new residential units in the Plan area as well as restrictions on the number of golf courses allowed in the Plan area and the potential transfer of some development rights outside of the Plan area (similar to the "Restricted Development/Transfer Development Rights Alternative evaluated above). However, no specific details on land use mix, specific location or density of development and roadway improvements were provided. Further reductions in the planned amount and extent of development in the Plan area (as suggested by the commentors) would result in reduced environmental impacts and environmental benefits as compared to the Proposed Land Use Diagram associated with land use, traffic, noise, air quality, hydrology and water quality, geology and soils, biological resources, public services and visual resources. However, such reductions in residential development potential and may not be considered in conformance with the direction given by the Board of Supervisors that no major changes are made to the existing land use plan as part of the update of the Martis Valley General Plan (1975). In addition, such alternatives may be considered to be less than adequate to meet Goal 1.B of the proposed Martis Valley Community Plan.

As identified in the Revised Draft EIR, the Lowest Intensity Alternative would limit new residential development to 2,646 dwelling units and would generally cluster new development adjacent to existing developed areas associated with the Northstar-at-Tahoe resort community, Lahontan I and II and the Ponderosa Palisades/Sierra Meadows area, with the exception of the Waddle Ranch area (Revised Draft EIR pages 6.0-38 and –39). In addition, the Revised Draft EIR also considers a Clustered Land Use Alternative. Both of these alternatives incorporate commentor's suggestions regarding alternatives, with the exception of golf course restrictions. The Martis Valley Community Plan does not specifically designate land areas within the Plan area for golf course uses, but does not limit or restrict such uses either.

Adequacy of the Description of the Alternatives Considered in the Draft EIR and Revised Draft EIR

Several commentors have suggested that the alternative descriptions in the Draft EIR and Revised Draft EIR fails to provide adequate information in order to compare the environmental benefits and detriments of the alternatives to the Proposed Land Use Diagram. Specific information that commentors requested includes specific locations of development areas and anticipated mix of units, photo simulations of the alternatives, details on the specific numbers of residential units and commercial/office square footage, pricing and/or rental rates expected for residential units, and biological resource data for the development areas.

As previously described above and in the Draft EIR, the project evaluated in the Draft EIR is the update of the Martis Valley Community Plan, which is the primary policy document for regulating land use development for the entire Plan area (approximately 25,570 acres) and is not intended to approve or promote the specific form of development that would occur on property within the Plan area. The Revised Draft EIR includes a detailed description of the various land use intensities and development area reduction alternatives for the Plan area for consideration of the adoption of the Martis Valley Community Plan. Based on this fundamental definition of the "project" that is evaluated in the Draft EIR and Revised Draft EIR, the

descriptions of the range of alternatives considered are adequate for the purposes of CEQA. These descriptions provided in Section 6.0 (Project Alternatives) of the Revised Draft EIR include identification and graphics describing the number of residential units and the associated densities, extent of commercial, office and public uses, as well as the extent of open space and forest areas. This extent of information for the alternatives is similar to the information provided for the Proposed Land Use Diagram, which allowed a detailed comparison of the alternatives to the Proposed Land Use Diagram that was provided in Section 6.0 (Project Alternatives) of the Revised Draft EIR. The alternatives analysis is based on extensive biological resource information and mapping provided in Section 4.9 (Biological Resources) of the Draft EIR, which specifically identifies the location and extent of habitat areas, wetlands and waterways. Given that the project consists of the adoption of an updated community plan to regulate development of the Plan area through the year 2020, production of photo simulations and pricing/rental rates for future development (current housing pricing and affordability information is provided in the Draft EIR on pages 4.2-5 through –12) as part of the alternatives analysis is not considered appropriate or necessary for the purposes of an alternatives analysis under CEQA.

Adequacy of the Alternatives Analysis Comparison to Significant Environmental Impacts of the Proposed Land Use Diagram

Several comment letters suggest that the alternatives analysis in the Draft EIR and Revised Draft EIR lacks adequate detail and should include a quantitative analysis. CEQA Guidelines 151526.6(b) specifically notes that the purpose of an alternatives analysis in an EIR is to consider alternatives to the project that could reduce, mitigate or avoid the significant environmental impacts of the project. The alternatives analysis provided in the Revised Draft EIR provides a detailed comparison of the significant environmental effects of Proposed Land Use Diagram identified in the Draft EIR to the alternatives identified above consistent with and in beyond the requirements of CEQA (CEQA Guidelines 15126.6[d] identifies that the discussion of the significant effects of an alternative need not be as detailed as the analysis of the project). As noted on page 6.0-1 of the Revised Draft EIR, the Existing Martis Valley General Plan Land Use Map (denoted as "AA" in the Draft EIR and Revised Draft EIR), Alternative 1 Land Use Map (denoted as "AB" in the Draft EIR and Revised Draft EIR) and the Alternative 2 Land Use Map (denoted as "AC" in the Draft EIR and Revised Draft EIR) are evaluated at an equal level of detail (which includes quantitative analysis). The differences in environmental impacts between these alternatives and the Proposed Land Use Diagram are documented in Sections 4.1 through 4.12 of the Draft EIR.

Alternatives described in Section 6.0 (Project Alternatives) of the Revised Draft EIR are compared against the Proposed Land Use Diagram by comparing their environmental benefits and detriments to the significant environmental impacts identified for the Proposed Land Use Diagram in the Draft EIR (Revised Draft EIR pages 6.0-6 through –48). This includes quantification of the alternatives' affects as compared to the Proposed Land Use Diagram, such as reduced traffic, air quality and water supply effects. In addition, the alternatives analysis also quantifies the reduced extent of land disturbance and associated effects on water resources, geology and soils, biological resources, cultural and paleontological resources, public services and visual resources. The alternatives analysis provided in Section 6.0 (Project Alternatives) of the Revised Draft EIR is based on the technical information, analyses and materials provided and/or cited in the Draft EIR, including additional traffic modeling, use of air quality modeling data, vegetation and habitat mapping and other resource mapping. Table 6.0-3 of the Revised Draft EIR summarizes the alternatives' comparison to the Proposed

Land Use Diagram by each significant environmental impact identified for the Proposed Land Use Diagram in the Draft EIR (Revised Draft EIR page 6.0-49).

Improper Rejection of Alternatives Analyzed in the Draft EIR and Revised Draft EIR

Several comment letters suggested that the Draft EIR and Revised Draft EIR fail to provide adequate information for the rejection of alternatives evaluated and also note that the requirements under CEQA to consider the environmentally superior alternative would supercede Placer County Board of Supervisor's direction regarding the Martis Valley Community Plan Update. The information provided in the Revised Draft EIR provides adequate information for the consideration of the alternative identified and does not reject any of the alternatives considered in the Draft EIR or the Revised Draft EIR. Page 6.0-50 of the Revised Draft EIR notes that the Lowest Intensity Alternative may not be considered in conformance with the direction given by the Board of Supervisors. Reference to potential conflicts with Goal 1.B of the proposed Martis Valley Community Plan on page 6.0-50 of the Revised Draft EIR is supported by documentation in the Draft EIR regarding affordable and employee housing shortfalls in the region, existing and projected employment in the Plan area and the high housing costs (Section 4.2, Population/Housing/Employment), as well as reduction of Medium Density Residential (5 to 10 units per acre) land areas (119 acre reduction under the Lowest Intensity Alternative) that would limit housing opportunities for lower income levels. These points are supported by substantial evidence in the EIR and administrative record and are consistent with reasons why an alternative can be rejected (i.e., specific economic, legal, and social considerations [CEQA Guidelines 15091{a}{3}). Ultimately, reasons for supporting the County's adoption of a new land use map as part of the adoption of the Martis Valley Community Plan will need to be documented in findings required under CEQA Guidelines 15091, 15092 and 15093, which would include findings regarding the rejection of alternatives identified in the Final EIR.

3.4.6 CONSIDERATION OF IMPACTS TO THE TAHOE BASIN

Several comment letters expressed the concern that the Draft EIR failed to adequately address project impacts to the Tahoe Basin, including consideration of applicable plans and standards of the Tahoe Regional Planning Agency (TRPA) (e.g., Compact and Environmental Thresholds).

The Draft EIR does specifically and adequately address potential project effects to the Tahoe Basin in regards to affordable and employee housing (Draft EIR pages 4.2-20 through -24), traffic (Draft EIR pages 4.4-39 through –57), traffic noise along SR 267 and SR 28 (Draft EIR pages 4.5-20 through –34 and Appendix 4.5) and air quality and associated water quality from air pollutant atmospheric deposition (Draft EIR pages 4.6-8 through –20). Specifically in regards to air quality, it is estimated that the Proposed Land Use Diagram could generate up to approximately 2,067 daily trips that would be within the Tahoe Basin. This traffic would contribute to the Tahoe Basin approximately 9.45 pounds per day of ROG, 29.26 pounds per day of NO_x and 16.01 pounds per day of PM10 during the summer and 9.95 pounds per day of ROG, 31.94 pounds per day of NO_x and 56.42 pounds per day of PM10 during the winter. While the Plan area is not located with the Tahoe Basin and is not subject to policies and regulations of the Tahoe Regional Planning Agency, these impacts may impede the TRPA's efforts to meet their Environmental Thresholds associated with traffic, noise and air quality (According to the TRPA's 2001 Threshold Evaluation, Thresholds AQ-7 [vehicle miles traveled] and N-3 [Community Noise Equivalent Level] are not being met). Traffic impacts within the Tahoe Basin (under cumulative conditions) would be limited to the intersection of SR 267 and SR 28 (Draft EIR pages

4.4-75 through –80). Project contributions to the future traffic conditions of this intersection are approximately 21 percent of the total traffic under peak conditions and no significant project traffic impacts would occur on the SR 28 roadway segment. Project generated traffic beyond SR 28 is anticipated to further disperse and no other significant traffic impacts are expected.

While there would be significant traffic, noise and air quality impacts to the Tahoe Basin, there is no evidence suggesting that the project would result in significant public service, parking and recreational impacts that would trigger a physical effect on the environment (i.e., necessitates need for the construction of new parking facilities) and no evidence has been provided by the commentors to substantiate this concern. In addition, the project would not have any direct impacts on habitat conditions, wildlife resources, soil conservation or visual resources in the Tahoe Basin, since the Plan area is outside of the Tahoe Basin. Potential indirect impacts associated with wildlife movement (e.g., deer migration) and nighttime lighting that could impact the Tahoe Basin have been addressed in the Draft EIR that includes proposed policies, implementation programs and mitigation measures for these issues (Sections 4.9, Biological Resources [mitigation measures MM 4.9.11a and b] and 4.12, Visual Resources [mitigation measures 4.12.4a through f]). It should be noted that Lake Tahoe is a destination resort area that approximately 2.2 million visitors enjoy each year and over $5.5 million dollars by several public agencies and entities in promoting tourism, recreation and the beauty of Lake Tahoe state-wide, nationally and internationally is spent based on information from the Incline Village-Crystal Bay Visitors and Convention Bureau Visitors Profile and a 1997 Lake Tahoe Economy Dollar Volume Estimates Report by Strategic Marketing Group Research of South Lake Tahoe. Research conducted by the North Lake Tahoe Resort Association identifies that the Lake Tahoe visitation breakdown consists of visitors from northern California (approximately 57 percent winter and 44 percent summer), out of state (approximately 28 percent winter and 34 percent summer), southern California (approximately 9 percent winter and 15 percent summer) and foreign (approximately 6 percent winter and 7 percent summer) (North Lake Tahoe Visitor Profile Study, 1997/98). Subsequent development under the Martis Valley Community Plan would provide additional housing, recreation and commercial uses and promote internalization of activities within the Plan area.

3.4.7 ADEQUACY OF THE CUMULATIVE SETTING AND IMPACT ANALYSIS IN THE DRAFT EIR

Several comment letters expressed the concern that the Draft EIR failed to provide an adequate analysis of the cumulative impacts of the project taking into account anticipated development in the region and that the Draft EIR failed to adequately describe the cumulative setting conditions. As described in Section 5.0 of the Draft EIR, CEQA requires that an Environmental Impact Report (EIR) contain an assessment of the cumulative impacts that could be associated with the proposed project. According to CEQA Guidelines Section 15130(a), "an EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable." "Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects (as defined by Section 15130). As defined in CEQA Guidelines Section 15355, a cumulative impact consists of an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. A cumulative impact occurs from:

> *...the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably*

foreseeable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

In addition, Section 15130(b) identifies that the following three elements are necessary for an adequate cumulative analysis:

1) Either:

   (A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or,

   (B) A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency.

2) A summary of the expected environmental effects to be produced by those projects with specific reference to additional information stating where that information is available; and

3) A reasonable analysis of the cumulative impacts of the relevant projects. An EIR shall examine reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative effects.

The Draft EIR utilizes both the "list" and the "general plan" approach in the cumulative analysis (Draft EIR page 5.0-2).

Specific concerns regarding the cumulative impact analysis identified by comment letters are summarized below. Response to each of these concerns is also provided below.

The Draft EIR failed to address cumulative environmental effects to the Tahoe Basin and the Town of Truckee.

As noted in the Draft EIR, the cumulative analysis takes into account existing land use plans in Placer County (including the Tahoe Basin) as well as land use plans for the Town of Truckee (Draft EIR page 4.0-7). In addition, the Draft EIR also notes large-scale development projects in region, including those in the Town of Truckee (Draft EIR pages 3.0-11 through –17). As described in the cumulative impact analyses in the technical sections of the Draft EIR (Sections 4.1 through 4.12), cumulative setting conditions and impacts involving the Town of Truckee and the Tahoe Basin were addressed. Significant cumulative impacts that included consideration of the Town of Truckee and/or the Tahoe Basin identified in the Draft EIR include employee/affordable housing (Impact 4.2.3); traffic impacts on area roadway network (Impact 4.4.7); traffic impacts to regional highway facilities (Impact 4.4.8); transportation noise (Impact 4.5.5); regional air quality (Impact 4.6.5); water quality (Impact 4.7.7); groundwater usage (Impact 4.7.9); biological resources (Impact 4.9.12); prehistoric and historic resources (Impact 4.10.3); paleontological resources (Impact 4.10.4); fire protection (Impact 4.11.1.3); park and recreation facilities (Impact 4.11.8.2); and visual resources (Impact 4.12.5).

The Draft EIR failed to address the cumulative environmental effect of the lack of affordable and employee housing.

Project and cumulative impacts to affordable and employee housing demand in the region is addressed in detail in Section 4.2 (Population/Housing/Employment) of the Draft EIR. The shortage of affordable and employee housing in the region and the project's contribution to this condition is a social/economic issue and is not itself a physical effect on the environment as set forth in CEQA Guidelines Section 15131. However, an EIR may trace a chain of cause and effect from a project's economic or social change to physical changes in the environment. The resulting environmental effect is increased traffic, air pollution and traffic noise impacts, which were identified in the Draft EIR (Draft EIR pages 4.2-20 through -24) as well as Sections 4.4 (Transportation and Circulation), 4.5 (Noise) and 4.6 (Air Quality) of the Draft EIR. Thus, the Draft EIR does take into account the known project and cumulative environmental effects associated with the lack of affordable/employee housing.

The Draft EIR failed to provide a large enough geographic area to address cumulative impacts associated with traffic, air quality and employee housing and should be expanded to include the City of Auburn, the Tahoe Basin, the City of Reno and the City of Sparks.

The Draft EIR includes a description of general cumulative setting conditions associated with the project (Draft EIR pages 4.0-7). In addition each technical section of the Draft EIR (Sections 4.1 through 4.12) provides a specific description of the cumulative setting conditions for each issue area. In regards to the extent of the study area for the traffic analysis, the Draft EIR already addresses the impacts to the Tahoe Basin associated with the intersection of State Route 267 and State Route 28 as well as State Route 28 roadway segment east and west of its intersection with State Route 267 (Draft EIR pages 4.4-39 through –72). Given the distance from the cities of Auburn, Reno and Sparks, the project is not expected to result in any significant traffic impacts within the cities of Auburn, Reno and Sparks and no evidence has submitted that justifies such a traffic impact would occur. While employees commuting to and from the Plan area has been suggested as a reason to consider traffic impacts in the cities of Auburn, Reno and Sparks, a survey regarding where current employees in the North Tahoe/Truckee area reside completed in 2002 by the North Lake Tahoe Resort Association that identifies that approximately 89 to 91 percent of area employees reside in the North Tahoe/Truckee area. This information is consistent with external traffic distribution assumptions in the Draft EIR. The Draft EIR does address the project's contribution to cumulative traffic impacts on Interstate 80 (Draft EIR pages 4.4-70 through -72).

Regarding project and cumulative air quality impacts, the Draft EIR addresses cumulative air quality effects that take into account the Tahoe Basin as well as the Mountain Counties Air Basin (Draft EIR page 4.6-19). In addition to the estimations on total air pollutant emissions expected from the project (Draft EIR page 4.6-13 and -14), the Draft EIR also specifically notes climatic conditions (wind direction) associated with the potential the extent that project generated air pollution would affect the Tahoe Basin. The reader is also referred to Master Response 3.4.6 regarding estimations of project vehicle emissions that would occur in the Tahoe Basin.

The Draft EIR failed to specifically consider the following projects: expansion of the Truckee-Tahoe Airport, Teichert Mine expansion, Northstar-at-Tahoe Mountains Improvements Project, Town and Country Center Project, Alpine Knolls Subdivision, Homesites at Squaw Creek #2, Meadows Subdivision, Mourelatos Lakeshore Resort, Plumpjack Squaw Valley Inn

Expansion Project, Tahoe City Marina Expansion Master Plan, Tahoe Sands Resort Redevelopment, and Whispering Pines Village.

Table 3.0-1 of the Draft EIR was not intended to be an all-inclusive list of all development activity in the region, but rather an identification of large-scale projects that have some relation to the proposed project and/or the setting conditions of the project that was known at the time of preparation of the Draft EIR. As previously described above, the Draft EIR utilized both the "list" approach and the "general plan" approach (e.g., consideration of the buildout conditions set forth in the Placer County General Plan, Nevada County General Plan and the Town of Truckee General Plan) in regards to evaluating cumulative impacts of the project pursuant to CEQA Guidelines 15130(b).

The following is brief description of the projects noted above and their relationship to the cumulative analysis provided in the Draft EIR. The traffic model used in the traffic analysis takes into account growth in traffic growth in land in surrounding areas resulting from future development. This growth effectively takes into account the development projects within the Tahoe Basin. Therefore, by adding the traffic generated by these projects to the model projections may result in overestimating future traffic growth in the area. Regardless, none of the Tahoe Basin projects listed below would have a significant impact on traffic within the study area.

Expansion of the Truckee-Tahoe Airport: Planned expansion of the Truckee-Tahoe Airport is outlined in the 1998 Truckee-Tahoe Airport Master Plan, which is referenced in the Draft EIR. Development of the Martis Valley (which includes the Truckee-Tahoe Airport and its associated land area) was considered in the impact analysis regarding airport noise (Draft EIR pages 4.5-30 through -32); regional air quality (Draft EIR pages 4.6-19 and -20); cumulative drainage and water quality (Draft EIR pages 4.7-66 through -73); cumulative biological resource impacts (Draft EIR pages 4.9-88 and -89); cumulative cultural and paleontological resource impacts (Draft EIR pages 4.10-20 through -23) and cumulative visual resources (nighttime lighting) (Draft EIR pages 4.12-36 and -37).

Teichert Mine Expansion: The existing Teichert aggregate mining activities are currently within the Town of Truckee near Martis Creek east of the Tahoe-Truckee Sanitation Agency Wastewater Treatment facilities. This project would involve expansion of existing operations to extract aggregate at a deeper depth than currently allowed. This expansion could contribute to cumulative impacts identified for the project associated with traffic, air quality, water quality, biological resources and cultural resources. However, it should be noted that the Draft EIR for this project has not been released as of the completion of this Final EIR. However, the Draft EIR acknowledges these cumulative impacts as significant and identifies mitigation measures to mitigate the project's contribution to these impacts. No new cumulative impacts or mitigation measures are necessary as a result of the consideration of this project. Thus, the cumulative analysis and associated mitigation measures identified in the Draft EIR are still valid and adequately address the project's effects.

Northstar-at-Tahoe Mountains Improvements Project: This proposed project consists of the installation of a secondary out-of-base lift from Northstar Village to the mid-mountain area; replacement of the Pioneer lift with a realigned lift; clearing of new ski trail areas; provision of expanded snowmaking; reconfiguration of the mid-mountain beginner area adjacent to Big Springs Lodge by realigning the Bear Cub lift; realignment of the Lookout Overland

Express; and a real estate lift. This project could contribute to cumulative impacts identified for the project associated with groundwater supply, water quality, biological resources and cultural resource impacts. However, it should be noted that the Draft EIR for this project has not been released as of the completion of this Final EIR. However, the Draft EIR acknowledges these cumulative impacts as significant and identifies mitigation measures to mitigate the project's contribution to these impacts. No new cumulative impacts or mitigation measures are necessary as a result of the consideration of this project. Thus, the cumulative analysis and associated mitigation measures identified in the Draft EIR are still valid and adequately address the project's effects.

Town and Country Center Project: This project is located within the Plan area and consists of a commercial center within the existing commercial/office area adjacent to the Truckee Tahoe Airport. The project consists of 12,000 square feet for Western Nevada Supply and 35,000 of service oriented uses. The land uses are consistent with what has been assumed in the Draft EIR. Thus, the cumulative analysis and associated mitigation measures identified in the Draft EIR are still valid and adequately address the project's effects.

Alpine Knolls Subdivision: This project proposes a tentative subdivision map creating 19 single-family residential lots on 27 acres within the Alpine Meadows area. This project is a reduction of 62 residential units in total development potential allowed under the Placer County General Plan and Zoning Ordinance for this site. This project may contribute to cumulative significant impacts identified for the project associated with air quality, water quality, biological resources and cultural resources. However, as previously noted, the cumulative analysis is based on buildout under the Placer County General Plan and the Alpine Knolls project is within land uses assumed under the Placer County General Plan.

Homesites at Squaw Creek #2: This project is listed in Table 3.0-1 and was considered in the Draft EIR.

Meadows Subdivision: This project involves the subdivision and subsequent development of 12 duplex townhouse units and one common parcel. This project is located within the Sugar Bowl Ski Resort Development. Given the Meadows Subdivision distance from the Plan area and the size of the project, contribution to cumulative impacts associated with the project would be limited to traffic impacts to Interstate 80 (addressed under Impact 4.4.8 of the Draft EIR) and regional air quality (addressed under Impact 4.6.5 of the Draft EIR). No new cumulative impacts or mitigation measures are necessary as a result of the consideration of this project. Thus, the cumulative analysis and associated mitigation measures identified in the Draft EIR are still valid and adequately address the project's effects.

Mourelatos Lakeshore Resort: This project proposes to demolish existing older rental units and replace them with 32 new units. The project is located on North Lake Boulevard in Tahoe Vista. Given the Mourelatos Lakeshore Resort distance and location from the Plan area and the size of the project, contribution to cumulative impacts associated with the project would be limited to traffic impacts associated with SR 28 (addressed under Impact 4.4.7 of the Draft EIR), cumulative traffic noise (addressed under Impact 4.5.5) and regional air quality (addressed under Impact 4.6.5 of the Draft EIR). No new cumulative impacts or mitigation measures are necessary as a result of the consideration of this project. Thus, the cumulative analysis and associated mitigation measures identified in the Draft EIR are still valid and adequately address the project's effects.

Plumpjack Squaw Valley Inn Expansion Project: This project was specifically noted in Table 3.0-1 of the Draft EIR and considered in the cumulative impact analysis of the Draft EIR.

Tahoe City Marina Expansion Master Plan: This project involves expansion of the existing marina facility in Tahoe City. Given the Tahoe City Marina distance and location from the Plan area and the size of the project, contribution to cumulative impacts associated with the project would be limited to traffic impacts associated with SR 28 ((addressed under Impact 4.4.7 of the Draft EIR), cumulative traffic noise (addressed under Impact 4.5.5) and regional air quality (addressed under Impact 4.6.5 of the Draft EIR). No new cumulative impacts or mitigation measures are necessary as a result of the consideration of this project. Thus, the cumulative analysis and associated mitigation measures identified in the Draft EIR are still valid and adequately address the project's effects.

Tahoe Sands Resort Redevelopment: This project proposes the redevelopment of the existing Tahoe Sands Resort in Tahoe Vista and an expansion of the number of units to 86 to be contained in five separate buildings. Given the Tahoe Sands Resort distance and location from the Plan area and the size of the project, contribution to cumulative impacts associated with the project would be limited to traffic impacts associated with SR 28 (addressed under Impact 4.4.7 of the Draft EIR), cumulative traffic noise (addressed under Impact 4.5.5) and regional air quality (addressed under Impact 4.6.5 of the Draft EIR). No new cumulative impacts or mitigation measures are necessary as a result of the consideration of this project. Thus, the cumulative analysis and associated mitigation measures identified in the Draft EIR are still valid and adequately address the project's effects.

Whispering Pines Village: Placer County Planning Department that this project consists of the development of 6 duplexes in Kings Beach. Given Whispering Pines Village size location from the Plan area and the size of the project, contribution to cumulative impacts associated with the project would be limited to traffic impacts associated with SR 28 (addressed under Impact 4.4.7 of the Draft EIR), cumulative traffic noise (addressed under Impact 4.5.5) and regional air quality (addressed under Impact 4.6.5 of the Draft EIR). No new cumulative impacts or mitigation measures are necessary as a result of the consideration of this project. Thus, the cumulative analysis and associated mitigation measures identified in the Draft EIR are still valid and adequately address the project's effects.

The cumulative impact analysis in the Draft EIR fails to quantify the extent of the impacts.

Some comment letters stated that the cumulative impact analysis in the Draft EIR was inadequate because it failed to provide quantification of the extent of the impacts. CEQA Guidelines Section 15130(b) specifically notes that the discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but that the discussion need not provide as great detail as is provided for the effects attributable to the project alone. However, in several of the technical sections of the Draft EIR, quantitative information regarding the extent of the cumulative effect and/or the project's contribution are provided. Quantified information is specifically provided for traffic (Draft EIR pages 4.4-27 through –73), noise (Draft EIR pages 4.5-16 through –34 and Appendix 4.5), air quality (Draft EIR pages 4.6-7 through –20 and Appendix 4.6), water supply (Draft EIR pages 4.7-54 through -59), and public services (throughout Section 4.11 of the Draft EIR). Thus, the Draft

EIR provides both quantified and other technical data to adequately address the cumulative impacts associated with the project pursuant to the requirements of CEQA.

3.4.8 AFFORDABLE AND EMPLOYEE HOUSING EFFECTS OF THE PROJECT

Several comment letters expressed concerns regarding the adequacy of the affordable/employee housing setting and impact analysis in the Draft EIR and the adequacy of the proposed mitigation. Section 4.2 (Population/Housing/Employment) of the Draft EIR provides a detailed description of employment and housing conditions in the Plan area as well as for the surrounding region (Draft EIR pages 4.2-5 through –12). The Draft EIR specifically notes current employment figures for the Northstar-at-Tahoe resort community and estimates of employees associated with Lahontan I and II as well as current employee housing provisions provided by Northstar-at-Tahoe (Draft EIR page 4.2-10 through -12). Project and cumulative impacts to affordable and employee housing demand in the region is addressed in detail in the Draft EIR (Draft EIR pages 4.2-17 through –28). The shortage of affordable and employee housing in the region and the project's contribution to this condition is a social/economic issue and is not itself a physical effect on the environment as set forth in CEQA Guidelines Section 15131. However, an EIR may trace a chain of cause and effect from a project's economic or social change to physical changes in the environment. The Draft EIR addresses the social/economic impact and addresses the environmental effects of a lack of affordable and employee housing from the project, which would result in households and employees traveling outside of the area to find available housing. The resulting environmental effect is increased traffic, air pollution and traffic noise impacts, which were considered in the Draft EIR (Draft EIR pages 4.2-17 through –24). A survey regarding where current employees in the North Tahoe/Truckee area reside was completed in 2002 by the North Lake Tahoe Resort Association. The results of the survey identify that approximately 89 to 91 percent of area employees reside in the North Tahoe/Truckee area rather than travel outside of region for housing (North Lake Tahoe Resort Association, 2002). This information is consistent with external traffic distribution assumptions in the Draft EIR. Thus, the Draft EIR does adequately address the known project and cumulative environmental effects associated with the lack of affordable and employee housing.

It should be noted that since release of the Draft EIR, Placer County has adopted a new Housing Element and has drafted an Employee Housing Ordinance and Inclusionary Housing Ordinance to further implement County policies regarding the provision of employee housing in the Tahoe-Sierra region and affordable housing County-wide. The future Employee Housing Ordinance and Martis Valley Community Plan policies 3.A.3 and 3.A.4 would ensure that affordable/employee housing is provided for future uses in the Plan area. As a result, Mitigation Measure MM 4.2.2 is repetitive with these policies and future Ordinance and has been eliminated (see **Table 2.0-1** of this document).

- Draft EIR pages 2.0-9 (Table 2.0-1), 4.2-26, and 8.0-3 (Table 8.0-1), Mitigation Measure MM 4.2.2 is deleted:

  "~~MM 4.2.2~~ ~~As a condition of approval of each housing development in Martis Valley, the project applicant shall construct 5 percent of units affordable to very low income households (0 to 50 percent of area median income) and 5 percent of units affordable to low income households (50 to 80 percent of median income). Where practicable, the County shall require the future developer of each project site to construct affordable housing~~

~~as early as possible. In instances where the County finds that it is not feasible to construct the affordable units, the developer shall be required to pay a fee as described in Policy 3.A.3.~~

~~Responsible Agency/Department: Planning Department~~
~~Time frame: Ongoing~~
~~Funding: General Fund~~"

3.4.9 ADEQUACY OF THE PUBLIC REVIEW PERIOD

Several comment letters expressed concerns regarding the adequacy of the time period provided to review and comment on the adequacy of the Draft EIR. CEQA Guidelines Section 15105 identifies that the public review period for a Draft EIR should not be less than 30 days nor longer than 60 days except in unusual circumstances. The County publically released the Draft EIR on June 20, 2002 for a 45-day public review period. After receiving requests to extend the comment period, the County extended the public comment period to August 19, 2002, which provided for a 60-day public comment period. As set forth under CEQA Guidelines 15105, the County provided an adequate public review period consistent with CEQA. It should be noted that comments submitted on the project and its EIR will still be considered up to approval of the project.

3.4.10 ADEQUACY OF THE TRAFFIC IMPACT ANALYSIS

Several comment letters expressed concerns regarding the adequacy of the traffic analysis in regards to the assumptions used in the traffic modeling, extent of geographic area evaluated in the traffic analysis, consideration of traffic impacts to the Town of Truckee and the Tahoe Basin and transit impacts. The following is a master response to these issues.

Overview of Traffic Analysis

The traffic impact analysis was conducted by expanding the existing Town of Truckee traffic model to include the Martis Valley area. This approach was chosen (a) to accurately reflect the route choice process in Truckee and (b) as there is not an existing valid model of the Tahoe Region. A separate set of assumptions regarding trip rates was used for the Martis Valley portion of the model. Through several revisions to the model assumptions, the model was calibrated to observed 2001 traffic volumes. It was determined by the County that the model was within an acceptable error range. A more detailed description of the model calibration process may be found in Appendix 4.4 of the Draft EIR. The model has the following characteristics:

1. The general model boundaries are as follows:

    - Town of Truckee town line at I-80 to the west, I-80 to the east, Glenshire Drive to the east, SR 89 North to the north, Donner Pass Road to the west, and Prosser Dam Road to the east

    - SR 89 South just south of West River Street

- SR 267 at Brockway Summit (Traffic volume at the SR 28/SR 267 intersection were estimated based upon the Brockway Summit external node and observed traffic distribution at the intersection.)

2. The model is used to estimate summer Friday PM peak-hour traffic conditions only. Average daily traffic (ADT) volumes and winter peak-hour volumes can only be estimated by adjusting the summer peak-hour volumes appropriately. In general and as described in the Draft EIR, winter peak-hour volumes are estimated by applying a summer to non-skier winter volume ratio to each turning movement and then assigning skier traffic. ADT volumes are estimated by applying an ADT to peak-hour factor (based on existing daily and peak-hour counts) to two-way summer PM peak-hour roadway link volumes.

3. The model is based upon a limited number of land uses types, which include commercial, residential, office, and recreational uses. Proposed development project-specific variations in land uses other than the basic land use types contained in the model were outside of the scope of the analysis associated with the Martis Valley Community Plan.

4. The model assumes the build out of the Town of Truckee General Plan as it currently exists.

5. The trip rates assumed for each land use type are explained on Draft EIR page 4.4-35. Many of the comments received expressed concern over the use of the assumption that 80 percent of the homes in the Martis Valley area will be second homes (i.e., seasonal in use) in the future. However, it is important to note that the analysis assumed full occupancy of all units. The 80/20 split in second/primary homes was used to estimate residential trip rates. It is true that the second homes have lower trip rates because second homes do not generally generate as many trips as primary homes. Second homes typically do not generate the typical commute work and school trips generated by primary homes. This is supported by data presented in the Institute of Transportation Engineers Trip Generation Manual. The 80/20 split was used in the 2001 model that was used to calibrate the model to existing conditions. As the assumption calibrates to existing conditions, it can be assumed to be accurate. The reader is referred to Master Response 3.4.2 (Assumptions Used for Development Conditions in the Plan Area) regarding further justification for the 80/20 split.

6. Traffic volumes were analyzed for the summer PM peak-hour and the winter 30th highest hour. The traffic volumes throughout the Martis Valley, Town of Truckee, and the North Shore vary greatly by time of day, day of week and, more importantly, by season. Particularly in such an area, it is important to decide what hourly traffic volumes should be used as the basis of design. To avoid the development of facilities that are only needed a relatively few days per year, the traffic engineering profession has adopted a standard procedure of basing roadway design on a lower volume. For this reason the Town of Truckee, for example, has focused most of its design policies on the summer peak hour, rather than the winter peak hour. A Policy on Geometric Design of Highways and Street (American Association of State Highway and Transportation Officials, 2001) indicates "The design hourly volume for rural highways ... should generally be the 30th highest volume of the future year chosen for design." (page 61). It is true that during winter peak periods, traffic volumes occasionally exceed the

intersection and roadway capacity. However, to avoid the development of facilities that are only needed a relatively few days per year, the 30th highest winter peak hour was analyzed, which is consistent with standard engineering design practice. LOS thresholds that are currently and cumulatively exceeded are identified in the Draft EIR.

The purpose of the model is to provide an overall analysis of future traffic conditions in the Martis Valley upon build out of the various plan alternatives. The purpose of the Draft EIR was not to evaluate each individual development project's impacts. All other major individual development projects will be required to prepare subsequent environmental documentation in addition to the Martis Valley Community Plan Update EIR, pursuant to CEQA. The environmental documents will need to address the project-specific environmental impacts, including but not limited to, construction traffic impacts, emergency access, project access design issues, internal bicycle and pedestrian facilities, and operation of additional individual intersections.

In addition, it is not standard practice in environmental analysis to evaluate conditions during special events, such as road closures due to construction activities or particularly severe weather conditions. Although it is true that the additional traffic generated by the project will worsen conditions during road closures and traffic incidents, these events are special events and it is not typical traffic engineering practice to design for or evaluate conditions associated with special events that occur only a few times a year.

Adequacy of Land Uses Assumed in the Traffic Analysis

The reader is referred to Master Response 3.4.2 (Assumptions Used for Development Conditions in the Plan Area) regarding the justification of land use intensities used in the traffic analysis.

Determination of Proper Peak Hour to be Analyzed

The summer Friday PM peak-hour was chosen for analysis as it represents the peak traffic conditions along SR 267 in the project vicinity in the summer. This is generally the case as Fridays must accommodate commuter traffic, school traffic, and recreational weekend traffic entering the Plan area. Evidence of this conclusion is provided by traffic data provided by Caltrans along SR 267 in July 1997. As shown in the figures in **Appendix A**, traffic volumes along SR 267 north of Northstar Drive were highest on Friday between 5:00 PM and 6:00 PM. The next highest peak occurred on Sunday morning. No more recent counts at this location are currently available from Caltrans.

The winter Saturday PM peak hour was chosen for analysis as is represents the peak traffic conditions along SR 267 in the project vicinity during the winter. Available winter Caltrans and LSC-conducted count data is provided in **Appendix A**. January 2003 Caltrans count data is provided along SR 267 at Martis Peak Road and north of Northstar Drive in **Appendix A**. As the data indicates, the peak-hour volume along SR 267 occurs on a Saturday between 4:00 PM and 5:00 PM. At Martis Peak Road, the peak-hour volume along SR 267 also occurs on a Saturday between 4:00 PM and 5:00 PM. Also, as shown in the SR 28 count data, PM peak-hour volumes are generally higher than AM peak-hour volumes in the winter.

Based upon the data presented above, other traffic count data collected for traffic studies in the area, and LSC Transportation Consultants' (traffic consultant for the project) experience

with and knowledge of traffic conditions in the area, the peak-hours included in the analysis are concluded to remain valid.

Adequacy of Geographic Extent of Study Area

The geographic area analyzed in the traffic analysis extends from Truckee to the north and the Tahoe Basin to the south. Traffic impacts to areas in the Town of Truckee, Placer County and the Tahoe Basin are addressed in the Draft EIR (Draft EIR pages 4.4-39 through –73). However, in order to respond to the comments received indicating doubt that a large enough area was analyzed, the analysis has been extended slightly to address impacts to SR 28 in the Tahoe Basin, I-80 to the east and west and SR 89 in Nevada County, discussed below.

The revised Proposed Land Use Diagram and Minimal Development Land Use Alternative's contribution to future traffic growth in the region is summarized in **Table 3.0-1.** As **Table 3.0-1** indicates, the Proposed Land Use Diagram is expected to contribute between 16 and 51 percent of total future traffic growth in the area between now and 2021. The largest impact would be to SR 267 across the Town of Truckee/Placer County line, where the Proposed Land Use Diagram would contribute 51 percent of the traffic growth along this segment. The smallest impact is to SR 28 to the east and west of SR 267. The Proposed Land Use Diagram is expected to generate 147 PM peak-hour trips to SR 28 to the east of SR 267 and 110 PM peak-hour trips to the west of SR 267. Assuming half of the traffic along SR 28 is diverted into Tahoe Vista and Carnelian Bay, the project is expected to generate 55 summer PM peak-hour trips in the Tahoe City area. The Lowest Intensity Alternative is expected to generate 67 PM peak-hour trips to SR 28 to the east of SR 267 and 37 PM peak-hour trips to the west of SR 267, indicating this land use alternative would generate 19 summer PM peak-hour trips to the Tahoe City area. As shown in **Table 3.0-2**, the propose project is expected to increase peak-hour traffic volumes along SR 28 in Tahoe City by 3 percent and traffic volumes in King Beach along SR 28 in Kings Beach by 9 percent, which are not considered to be significant increases. Assuming 20 percent of the traffic is diverted into Kings Beach, the project would result in a 6 percent increase in peak-hour traffic volumes along SR 28 at the state line, which is not considered to be a significant increase.

Ski Traffic

As mentioned above, the winter peak-hour traffic volumes were estimated by applying a non-skier winter to summer peak hour ratio (developed from existing traffic data) to summer peak-hour volumes and then adding the ski area traffic back into the non-skier winter volumes. The winter volumes do assume that no new day skier parking spaces will be provided at Northstar-at-Tahoe Ski Resort in the future, per an agreement Northstar-at-Tahoe Ski Resort has with the County. The additional skiers accommodated by future expansion of the Northstar-at-Tahoe Ski Resort would come from areas internal to the Northstar-at-Tahoe resort community, such as from the Northstar Village or the proposed Northstar Highlands development. These skiers would have a negligible impact on traffic outside Northstar. In addition, the operational problems along Northstar Drive would still occur during peak ski days, although providing four lane along Northstar Drive from the proposed Highlands development access road to SR 267 should allow the roadway to operate at an adequate LOS during the summer and non-peak ski days.

One of the data items collected as a part of the Northstar-At-Tahoe Traffic Monitoring Program is the number of hours and days during which southbound queues form along SR 267 to the

north of Northstar Drive due delays incurred by skier-generated AM peak-hour entering traffic. The 2002-2003 ski season data indicates that queuing onto SR 267 occurred on a total of ten days throughout the ski season. (This figure is similar to that observed for recent previous years: queues on the highway occurred on eight days per year in1999-2000 and 2000-01). The maximum queue lengths occurred on December 22 and December 23, 2002 (Sunday and Monday of the Christmas holiday week). It should be noted that the length of the traffic queues during the Christmas holiday period were exacerbated by the fact that the traffic signals at the SR 267/Airport Road/Schaffer Mill Road and the SR 267/Brockway Road intersections had recently been turned on, and signal timing had not been fully adjusted to serve ski traffic conditions. The signals provided insufficient green time for through movements on SR 267, which lengthened the queues. Signal timing has since been modified by Caltrans, so current and future conditions generated by these signals are substantially improved.

Consideration of Day Trips and Employee Trips

Day trips and employee trips are considered in the traffic analysis. A trip rate (trips per dwelling unit) is assigned to each residence. Some of the trips generated by the residential units are recreational trips. The commercial, office, and hotel trip rates also included employee trips.

According to the North Tahoe/Truckee Employer Commute Survey conducted for the North Lake Tahoe Resort Association, approximately 55 percent of the employers who work in the Martis Valley during the summer live in Truckee and during the winter 45 percent live in Truckee. The next highest percentage (13 in the summer and 22 during the winter) live on Lake Tahoe's West Shore, followed by Tahoe City (9 in the summer and 11 during the winter) and Tahoe Vista and Kings Beach (9 in the summer and 12 during the winter). Only 9 percent of the employees in Martis Valley travel live in areas outside the Tahoe Basin and Truckee such as Reno, South Shore, Minden, and Gardnerville during the summer and 6 percent during the winter, which is a relatively low number (North Lake Tahoe Resort Association, 2002). The Draft EIR identifies proposed policies and mitigation measures to provide and promote affordable and employee housing in the Plan area (Draft EIR pages 4.2-17 through –27). The reader is also referred to Master Response 3.4.8 (Affordable and Employee Housing Effects of the Project).

Northstar-at-Tahoe Resort Community Roadway Assumptions

The following specific comments were received regarding roadway facilities associated with the Northstar-at-Tahoe resort community. It should be noted that these comments are related to requested changes to the proposed Martis Valley Community Plan and are not direct comments on the traffic analysis provided in the Draft EIR.

- ***Do not open Schaffer Mill Road / Northstar connector to traffic -*** The proposed Martis Valley Community plan states that the Schaffer Mil Road connection to the Northstar-at-Tahoe resort community is not planned to be open to public traffic and would be used as a transit, pedestrian, bicycle, pedestrian and an emergency access corridor only (Martis Valley Community Plan page 74).

- ***Do not open the Big Springs Drive/ Highland Road loop to traffic –*** The proposed Martis Valley Community Plan currently identifies this connection, which was assumed in the traffic analysis (Martis Valley Community Plan page 74). However, if this connection was closed to public traffic, traffic volumes would shift internal to Northstar resulting in traffic

increases to Highland development access road and Northstar Drive between the Highland development access road and Northstar Village.

TABLE 3.0-1
PLAN CONTRIBUTION TO TOTAL FUTURE TRAFFIC GROWTH AT VARIOUS LOCATIONS THROUGHOUT STUDY AREA

Locations	2001 Summer Weekday PM Peak-Hour Two-Way Traffic Volumes	2021 Summer Weekday PM Peak-Hour Two-Way Traffic Volumes									
		No New Development in Martis Valley Area	Total with Project		Project-Generated		Future Growth (2001 to 2021)			Percent Contribution to Total Future Traffic Growth	
			Proposed Land Use Alternative	Lowest Intensity Alternative	Proposed Land Use Alternative	Lowest Intensity Alternative	No New Development in Martis Valley Area	Proposed Land Use Alternative	Lowest Intensity Alternative	Proposed Land Use Alternative	Lowest Intensity Alternative
SR 89 North at Truckee Town Line	192	254	281	271	27	17	62	89	79	30%	22%
SR 267 at Brockway Summit	1,037	1,877	2,181	2,153	304	276	840	1,144	1,116	27%	25%
SR 28 East of SR 267	1,731	2,380	2,527	2,447	147	67	649	796	716	18%	9%
SR 28 West of SR 267	1,512	2,083	2,193	2,120	110	37	571	681	608	16%	6%
I-80 at the East Town Line	3,028	4,635	5,138	5,078	503	443	1,607	2,110	2,050	24%	22%
I-80 at the West Town Line	2,832	4,026	4,362	4,327	336	301	1,194	1,530	1,495	22%	20%
SR 267 at Truckee/Placer County Line	1,619	3,055	4,534	4,462	1,479	1,407	1,436	2,915	2,843	51%	49%

Source: LSC, 2003

TABLE 3.0-2
PLAN CONTRIBUTION TO GROWTH ALONG SR 28

Roadway Segment	2001 Two-Way Peak-Hour Volume	Project's Impact		Percent Increase	
		Proposed Land Use Alternative	Lowest Intensity Alternative	Proposed Land Use Alternative	Lowest Intensity Alternative
SR 89 in Tahoe City (East of SR 89)	2,050	55	19	3%	1%
SR 28 in Kings Beach (East of Coon Street)	1,650	147	67	9%	4%
SR 28 at the State Line	2,050	118	54	6%	3%

Note: 2001 peak-hour volume based upon 2001 Caltrans count data.
Source: LSC, 2003

- ***Construct the skier intercept lots north of Northstar Drive just west of SR 267 -*** Per the direction of the Placer County Department of Public Works, the skier intercept lot was not assumed to be constructed in 2021. At the onset of the study, plans for the intercept lot were preliminary only and had not been submitted to the County. As the provision of skier intercept lots would substantially reduce winter peak-hour traffic volumes along Northstar Drive and as it is uncertain at this time whether this skier intercept lot would be built, the lot was conservatively not assumed to be built in the Draft EIR traffic analysis. However, if it is constructed, a roundabout can also be assumed to be constructed. In addition, Northstar Drive would only need to be four lanes from SR 267 to the Highland development access road. It was assumed in the model that this access would be located as the fourth leg of the Northstar Drive/Basque Road intersection, though further engineering analysis may allow this access to be located across from the existing gas station.

- ***Construct four lanes along Northstar Drive from SR 267 to the gas station and construct a roundabout at the Northstar Drive/Gas Station/Highlands Access/Skier Intercept Lot intersection –*** See response above associated with the skier intercept lots.

- ***Install a turning lane at Basque Road –*** The Northstar Village Draft EIR did identify that this intersection would need to be improved as a result of the expansion of the Village that would involve the construction of a eastbound acceleration lane on Northstar Drive and an exclusive southbound right-turn lane on Basque Road.

- ***Relocate chain check to a location south of the new employee housing location*** – No traffic impacts were identified specifically associated with this facility. In addition, SR 267 is a state highway facility under the jurisdiction of Caltrans.

Reanalysis of the Traffic Impacts Associated with the Martis Valley Community Plan Proposed Land Use Diagram

Per the direction of the Placer County Planning Department staff, the Proposed Land Use Diagram model was re-run with the following modifications associated with the assumptions:

1. Changes were made to the Proposed Land Use Diagram land use assumptions, as shown in **Table 3.0-3**.

2. The roadway network was revised to allow eastbound left turns (from I-80 eastbound to Donner Pass Road northbound) at the Donner Pass Road / I-80 eastbound intersection, as the intersection currently operates under this configuration. This configuration was not assumed under previous analyses because Caltran's original plan was to not allow left turns at this intersection after the completion of the SR 267 Bypass. Caltrans did not change the plan to allow left turns until after the completion of the original traffic analysis contained in the Draft EIR.

3. The land uses assumed for the Joerger Ranch (PC-3) Town of Truckee property were reviewed and compared to the most recent proposal for the Joerger Ranch development. It was determined that the Town of Truckee traffic model was underestimating the Joerger Ranch development by approximately half. Therefore, the land uses contained in the TAZ were updated to better reflect the proposed plan, per the direction of both Placer County and Town of Truckee staff. Please note that

although the proposed Joerger Ranch development is consistent with the Town of Truckee General Plan, its proposed land uses were not consistent with the assumptions contained in the Town of Truckee traffic model.

4. The access to the Sierra Pacific Industries development area was assumed to be provided via a fourth eastern leg of the SR 267/~~Northstar Drive~~ Highland Drive intersection, which would also provide access to the Sawmill Heights employee housing project and the Northstar Highlands development. In previous analyses it was assumed to be located south of ~~Northstar Drive~~ Highland Drive.

5. The location of residential land uses within Northstar was updated based upon the most recent plan for the Village per the most recent Northstar Highlands application. Previously, the location of remaining dwelling units was based upon the acreage of developable area in each TAZ.

The results of the analysis are presented in **Appendix B**, which consists of a revision of Section 4.4 (Transportation and Circulation) associated with the traffic analysis of the Proposed Land Use Diagram. As shown in the revised traffic analysis in **Appendix B**, the Proposed Land Use Diagram is now not expected to result in the need to widen Schaffer Mill Road to 4 lanes and result in reduced traffic impacts (though its traffic impacts would still be considered significant) than previously identified in the Draft EIR.

Transit Impact

Mitigation Measure 4.4.1a has been revised below to require the County to form a CSA or similar funding mechanism to improve transit to accommodate future growth as part of the Martis Valley Community Plan. The County shall also develop agreements that provide for input from and coordination with the CSA, Placer County, Town of Truckee, and development stakeholders to ensure coordinated service and connections with adequate capacity. The following text changes are made to the Draft EIR

- Pages 2.0-15 (Table 2.0-1), 4.4-51 and 8.0-4 (Table 8.0-1), the following text changes are made to Mitigation Measure MM 4.4.1a:

> **"MM 4.4.1a** ~~The County shall establish a capital improvement program for the land use map and roadway improvements ultimately approved by the County for the improvements identified in **Tables 4.4-20** through **4.4-25** (depending on the land use map adopted). This would include funding and coordination for traffic improvements associated with impacts identified in the Town of Truckee as well as to state highway facilities (SR 267 and SR 28).~~ The County will establish a capital improvement program for the land use and roadway improvements identified in Tables 4.4-20 through 4.4-25 (depending on the land use map adopted) for impacts identified within Placer County's jurisdiction.
>
> The County shall develop a mechanism whereby development within the plan area pays its fair share contributions toward transportation improvements outside of the County's jurisdiction as identified in this environmental document or as defined in project specific environmental impact reports.

The County shall complete a focused transit service plan for the Martis Valley area. This plan shall identify an appropriate and reasonable public transit program to accommodate future growth. The transit service plan shall develop a funding mechanism (potentially a CSA) and shall be the basis of developing agreements that provide for input from and coordination with the CSA, Placer County, Town of Truckee, and development stakeholders to ensure coordinated service and connections with adequate capacity and year-round service provisions. This plan shall be conducted after the completion of the Tahoe Area Regional Transit Short Range Transit Plan currently (May, 2003) being conducted by the Tahoe Regional Planning Agency and shall be consistent with this plan.

TABLE 3.0-3
PROPOSED LAND USE DIAGRAM LAND USE ASSUMPTION CHANGES

Development	Single-Family Dwelling Units			Multi-Family Dwelling Units			General Commercial (1,000 square feet of floor area)			Tourist Commercial (1,000 square feet of floor area)			Office (1,000 square feet of floor area)			Golf Course (effective number of holes - 80 percent reduction for private golf courses)			Hotel (rooms)		
	Previous	Revised	Change (Revised minus Previous)	Previous	Revised	Change (Revised minus Previous)	Previous	Revised	Change (Revised minus Previous)	Previous	Revised	Change (Revised minus Previous)	Previous	Revised	Change (Revised minus Previous)	Previous	Revised	Change (Revised minus Previous)	Previous	Revised	Change (Revised minus Previous)
Lahontan I and II and Joerger	588	588	0	0	0	0	0	0	0	0	0	0	9	4	-6	7	5	-2	0	0	0
Sierra Meadows	449	449	0	0	0	0	0	0	0	0	0	0	0	0	0	4	0	-4	0	0	0
Northstar Village	0	0	0	331	431	100	0	0	0	261	270	9	9	0	-9	0	0	0	0	0	0
Northstar Highlands	0	0	0	886	1,866	980	0	0	0	105	0	-105	26	0	-26	0	0	0	0	255	255
Other Northstar	751	825	74	1,732	578	-1,154	44	44	0	0	0	0	0	29	29	18	18	0	0	0	0
Martis Ranch	1,360	1,360	0	0	0	0	17	43	26	0	0	0	0	0	0	0	0	0	0	0	0
Hopkins Ranch	87	87	0	0	0	0	0	0	0	0	0	0	17	17	0	4	4	0	0	0	0
Siller Ranch	1,000	1,000	0	0	0	0	0	0	0	75	0	-75	78	20	-58	4	5	1	0	0	0
Eaglewood	464	464	0	42	0	-42	0	0	0	96	0	-96	0	0	0	4	4	0	0	0	0
Waddle Ranch	304	264	-40	700	735	35	9	43	34	0	0	0	0	0	0	4	4	0	0	0	0
Martis Creek Estates	16	12	-4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Northstar Employee Housing	0	0	0	270	270	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Northstar East of SR 267	160	160	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
County Line	80	80	0	0	0	0	26	26	0	0	0	0	0	0	0	0	0	0	0	0	0
Airport	0	0	0	0	0	0	174	174	0	0	0	0	218	0	-218	0	0	0	0	0	0
Total	5,259	5,289	30	3,961	3,880	-81	270	330	60	537	270	-267	357	70	-288	45	40	-5	0	255	255